

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SCOTT CRANE,

Plaintiff,

v.

RAVE RESTAURANT GROUP, INC.,

Defendant.

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§
§

Civil Action No. 4:20-cv-00013

DECLARATION OF R. ROGGE DUNN

STATE OF TEXAS

COUNTY OF DALLAS

'
'
'

I, R. Rogge Dunn, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury, that the following is true and correct to the best of my personal knowledge and based on information obtained through the review of records and inquiry of certain persons referenced herein.

1. I am over eighteen (18) years of age, I am of sound mind and body, and I have never been convicted of a felony or offense involving moral turpitude. I am fully competent to make this affidavit and file same in Cause No. 4:20-cv-00013 (this "Action").

2. I have personal knowledge of the facts stated herein because I am the most senior attorney representing Scott Crane (hereinafter the "Client"), the Plaintiff in this Action. I also have personal knowledge of the facts stated herein because I am employed by the Rogge Dunn Group, PC (hereinafter "RDG" or our "Firm") as its CEO. In my job position and as the most senior attorney representing the Client, I have experience and familiarity with the issues in, attorney work done, and the reasonable and necessary attorneys' fees incurred in this Action. I participated in and/or oversaw the legal work for the Client in this Action. A summary of the fees sought as an award in this Action is attached hereto as **Exhibit**

A. A true and correct copies of the billing records reflecting the services provided by RDG to the Client (partially redacted to protect attorney communications and work product) are attached hereto as **Exhibit B**.

3. I am an attorney licensed to practice law by the Supreme Court of Texas. I have been licensed since 1984. I currently practice with the firm of RDG.

4. Since I began practicing law, I have primarily been engaged in litigation matters. I have been lead counsel in jury and non-jury trials in federal and state courts and numerous arbitrations. I have experience and knowledge in a wide variety of civil law cases, including business and employment disputes. I devote a significant part of my practice to civil litigation. I routinely litigate matters involving causes of action for breach of contract cause of action.

5. I have been Board Certified in Labor and Employment Law since 1993. I have been Board Certified in Civil Trial Law since 2002. I have taken disputes to trial in lawsuits in four different states and seven cities in Texas. I have won million-dollar plaintiff awards in Texas, California, Arkansas, and Louisiana, including five verdicts/awards in the top 100 awards for a given year in a given state.

6. I received my Juris Doctor, with honors, in 1983 from the University of Texas. I served as a Note Editor on the *Texas Law Review* from 1982 to 1983. I was a law clerk to Honorable Reynaldo G. Garza, U.S. Fifth Circuit Court of Appeals from 1983 to 1984.

7. I have been selected as a "Super Lawyer" every year that award has been given. I have also been honored by Super Lawyers on two occasions as one of the top 100 attorneys in Texas and eight times as one of the Best Lawyers in Dallas Ft. Worth. I have been selected as one of the Best Lawyers in *D Magazine* 10 times. I have been rated as an AV Preeminent Lawyer by Martindale Hubbell for approximately the last 8 years. I have authored or co-authored three legal books. My bio is attached hereto as **Exhibit C**.

8. I am admitted to practice in the U.S. Supreme Court, all federal district courts in Texas, the Fifth Circuit Court of Appeals and the federal district courts in: the Eastern and Western Districts of

Arkansas, the Western District of Oklahoma, the Eastern and Western Districts of Missouri and the U.S. District of Colorado.

9. I am the CEO of the Firm, which is located at 500 N. Akard Street, Suite 1900, Dallas, TX, 75201-6629. I have 34+ years of litigation experience and have been actively engaged in the practice of law during that time. My practice has and still does include litigation of matters such as those involved in this Action. Texas Lawyer recognized Rogge Dunn Group as one of the top two labor and employment law firms in the Dallas/Ft. Worth area. In 2020 Rogge Dunn Group won the National Law Journal professional excellence award for litigation department of the year in the general litigation/small firm category.

10. I have participated in and have personal knowledge of this Action and the work performed in the representation of the Client. I have worked with and peer reviewed/observed all work of the other RDG lawyers and paralegals who have provided services to the Client in this Action.

11. The RDG attorney timekeepers who have rendered services in this Action include myself and:

Joshua Iacuone is a partner at RDG and has been licensed in Texas since 2002.
Bryan Collins is a partner at RDG and has been licensed in Texas since 1984.
Brian Shaw was a partner at RDG and has been licensed in Texas since 2006.
Greg McAllister is a partner at RDG and has been licensed in Texas since 2011.
Michael Myers was an associate at RDG and has been licensed in Texas since 2001.
Anna Richardson is an associate at RDG and has been licensed in Texas since 2017.
Cori McComber is an associate at RDG and has been licensed in Texas since 2006.
David Gross is an associate/counsel at RDG and has been licensed in Texas since 1988.
The other RDG timekeepers include paralegals Rhonda Thomas, Celeste Jones, Tina Vanderburg.

12. Attached is the initial engagement agreement between Plaintiff and RDG as **Exhibit D**. As shown in the invoices (July-Aug. 2019), Plaintiff initially retained RDG at usual and customary 2019 hourly rates: Dunn at \$850/hour; Iacuone at \$695/hour; Collins at \$600/hour; and paralegals at \$195/hour. Those rates increased over the last two years; now, Dunn usually and customarily charges \$1,000/hour and Iacuone usually and customarily charges \$900/hour. The fee arrangement with the Client changed on

August 27, 2019, when it the fee arrangement shifted to a hybrid fee, as reflected on **Exhibit E** attached hereto. But that new fee agreement does not change my analysis in the determination of what would be a reasonable fee under the lodestar standard.

13. The Client asks the Court to award fees at the hourly rates stated corresponding to each timekeeper set forth on the summary attached hereto as **Exhibit A** (for Dunn/Iacuone, average of usual and customary rates between original rates to current rates; for other partners, usual and customary rates at time they worked on the case) and apply the lodestar analysis:

14. In my opinion the hourly rates charged by RDG for the work of its attorneys and paralegals as reflected on **Exhibit A** is reasonable, customary, and well within the typical range in the Sherman, Texas market for the corresponding attorney considering the type of case and claims presented in the Action, as well as for the experience, reputation and ability of the attorneys performing these services on behalf of the Client.

15. The hourly rates charged by RDG to the Client are consistent with RDG's customary and usual billing rates for civil litigation similar to this Action--indeed, the rates charged to the Client in this case are below what RDG would typically charge clients.

16. Since 2016, my standard hourly rate for new clients has ranged between \$850.00 to \$1,000.00/hr for my time and paralegals are billed at \$195.00 to \$225.00/hr. The vast majority of my new clients who hire me on an hourly basis, pay me between \$850 to \$1,000 an hour.

17. I am familiar with the services RDG has rendered for the Client in this Action and certify that the legal services rendered were reasonable and necessary legal services incurred with respect to Plaintiff's causes of action in the Action. The issues involved in this Action related to the Client required RDG to: (1) draft and file a Complaint; (2) research and analyze legal issues; (3) draft pleadings; (4) consult with the Client; (5) research and analyze issues related to Defendant's Motion to Dismiss, including briefing the issues, studying and analyzing the Defendant's position on that issue; (6) engaging in written

discovery; (7) engaging in dispositive motion practice, including researching and preparing a response the Motion for Summary Judgment; (8) substantive communications with Defendant's counsel; (9) studying the pleadings, motion papers and briefing filed by Defendants; (10) reviewing and analyzing Defendants' discovery requests and responses; (11) conducting legal research regarding; (13) developing discovery, pre-trial, and trial strategy; (14) preparing for and conducting trial; (15) conferencing with RDG attorneys and peer reviewing with RDG attorneys regarding: strategy, tactics, legal analysis and the wording of pleadings in this Action. More detailed descriptions of the work performed, including the identification of the timekeeper, time spent, and tasks performed in this Action are reflected in **Exhibit B** attached hereto and incorporated herein.

18. I am familiar with the reasonable and customary attorneys' fees charged for services in civil litigation, including claims for breach of contract matters in Eastern District of Texas courts.

19. I am also familiar with the time necessary to perform certain tasks in prosecuting breach of contract claims in litigation. In reaching my opinion, I considered the opinion issued by the Texas Supreme Court: *Rohrmoos Venture v. UTSW DVA Healthcare, LLP*. 578 S.W.3D 469 (Tex. 2019), when reducing the base lodestar amounts, primarily to reduce time based upon what I believe were duplicative tasks performed by other timekeepers or time spent on tasks that exceeded what would be customary for a similar case. In my opinion, the time spent as reflected in **Exhibit A** under the column identified as "Hours Sought to be Recovered" for each corresponding attorney was reasonable and necessary in this Action.

20. RDG's invoices reflect the contemporaneous record of who performed the services, at what hourly rate, when the services were performed, and how much time the work required. These billing statements had been presented to the Client for payment.

21. The billing statements are kept by RDG in the regular course of business, and I am a custodian of those records. The information contained in the records was prepared in the regular course of business by employees of RDG that had personal knowledge of the information recorded therein. The

records were made at or near the time or reasonably soon after the time that the services were provided. The records are exact duplicates of the originals except for the redactions made.

22. In addition, it is anticipated that another 15 hours of attorney time will be necessary to prepare for and to pursue the Client's request for fees and costs, including review of Defendants' response and counter-affidavit, and drafting/researching Client's Reply in support of this Affidavit (and hearing, if necessary). In my opinion, a blended rate of \$500 is appropriate for this time, as it considers the time spent for the various timekeepers who will assist with the preparation of the Motion for Fees. In my opinion, the amount of \$7,500 is reasonable and necessary for the time and tasks necessary in connection with the Motion for Fees.

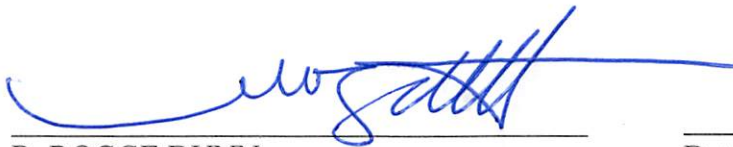
23. In reaching my opinions herein, I considered the applicable local standards, customs and practices, facts and law supporting those opinions, including but not limited to:

- a. Whether the fees were necessary and incurred.
- b. Whether the fees were reasonable including the base (hours worked and the amount charged per hour), the description of the work performed, whether the work was necessary to the prosecution or defense of the case (or both), and whether the fees were reasonable. They will also testify regarding the reasonable hourly rate prevailing in the county for similar work.
- c. Adjustment factors including:
 - (i) the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal services properly;
 - (ii) the likelihood that the acceptance of the particular employment precluded other employment by the lawyers;
 - (iii) the fee customarily charged in the locality for similar legal services;
 - (iv) the amount involved and the results obtained;
 - (v) the time limitations imposed by the client or the circumstances;
 - (vi) the nature and length of the professional relationship with the client;

- (vii) the experience, reputation, and ability of the lawyers performing the services; and
- (viii) whether the fee is fixed or contingent on results obtained and the uncertainty of collection before the legal services have been rendered.

24. In summary, and as reflected on Exhibit A attached hereto, it is my opinion that a reasonable and necessary fee in this Action through November 15, 2021, including the preparation and presentation of Client's Motion for Fees is in the total amount of \$818,144.75.

Pursuant to to 28 U.S.C. § 1746, declare under penalty of perjury, that the following is true and correct.



R. ROGGE DUNN

11/15/2021
Date

EXHIBIT A

Exhibit A

Summary of Fees Requested

Name	Title	Rate	Total Hours Spent	Reduction of Time	Hours Sought to be Recovered	Amount Sought
Dunn	Partner	\$925.00	42.9	18.8	24.1	\$22,292.50
Iacuone	Partner	\$797.50	715.7	210.8	504.9	\$402,657.75
Collins	Partner	\$600.00	12.6	4.3	8.3	\$4,980.00
Shaw	Partner	\$750.00	224.7	33.2	191.5	\$143,625.00
McAllister	Partner	\$750.00	252.4	24.8	227.6	\$170,700.00
Myers	Associate	\$385.00	10.3	0.6	9.7	\$3,734.50
Richardson	Associate	\$385.00	26.9	1.5	25.4	\$9,779.00
McComber	Associate	\$385.00	10.3	0.9	9.4	\$3,619.00
Gross	Associate	\$425.00	24.2	0.8	23.4	\$9,945.00
Thomas	Paralegal	\$195.00	258.5	85.4	173.1	\$33,754.50
Jones	Paralegal	\$195.00	22.3	7.2	15.1	\$2,944.50
Pounds	Paralegal	\$195.00	11.2	3.9	7.3	\$1,423.50
Vanderburg	Paralegal	\$195.00	12.8	6.7	6.1	\$1,189.50
			1624.8	398.9	1225.9	

Fees Requested Through October 31, 2021**\$810,644.75**

Anticipated time Through November 15, 2021

for preparation and presentment of Motion for Fees

15

15

Blended Hourly Rate

\$500.00

\$7,500.00**Total Fees Requested****\$818,144.75**

EXHIBIT B



500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott, Crane
6404 Drawbridge Lane
Plano, TX 75024

08/14/2019
Statement No: 1-3022
Matter ID: 7495-001

Your case name: Crane/Rave

Description of Legal Services

			Hours	
07/14/2019	RRD	VM [REDACTED] re Crane's matter (Discount: reduced by .10)		No/Chg
	RRD	VM from Crane (Discount: reduced by .10)		No/Chg
07/15/2019	CC	Finalize and serve letter regarding Crane severance (Discount: reduced by .30)	.10	19.50
	JJI	Review all of the file materials forwarded by Crane, including EA, draft Severance Agreement, LTIP Plan, etc., and draft 10,000 foot quick initial analysis	2.90	2,015.50
	JJI	35 emails re: severance/separation and agreement (Discount: reduced by 2.80)	.70	486.50
	JJI	Call with Crane re: options (37:47 min)	.60	417.00
	JJI	Draft demand for compensation/shares, revise, finalize and serve	1.60	1,112.00
	JJI	Crane/Rave Follow-up call with client re: letter (14:12 min)	.20	139.00
	PAR	Conduct conflict check: firm-wide email and firm-wide group voice mail regarding does new matter raise any conflicts (Discount: reduced by .30)		No/Chg
	PAR	Word search in our computer databases to be sure no prior representations create conflict (Discount: reduced by .30)		No/Chg
	PAR	Open file, enter Client contact and other info into system and PDA databases, create electronic file folders for future storage of documents & data, organize info & key docs and send TIPS letter	.40	78.00

Statement No: 08/14/2019
1-3022

	RRD	10 emails with Client and team re: new case and letter to Rave (Discount: reduced by .90)	.10	85.00
	TMV	4 emails with Iacuone and paralegal re: letter to Rave Restaurant (Discount: reduced by .20)	.20	39.00
	TMV	3 emails with Dunn and Iacuone re: representation (Discount: reduced by .30)		No/Chg
07/16/2019	JJI	5 emails re: demand letter [REDACTED] (Discount: reduced by .30)	.20	139.00
	JJI	Call w/client re: [REDACTED] letter (13:03)	.20	139.00
	JJI	Confer with atty Dunn regarding strategy and case issues	.30	208.50
	RRD	Conference w/JJI re case issues and strategy	.30	255.00
	RRD	2 EMs w/Client re checking in to ensure [REDACTED] and Josh is meeting the Client's needs (Discount: reduced by .10)	.10	85.00
07/17/2019	JJI	7 emails re: [REDACTED] next steps (Discount: reduced by .50)	.20	139.00
	PAR	Update docket sheet and distribute	.20	39.00
07/19/2019	PAR	EM to Client transmitting [REDACTED] letter	.10	19.50
	RRD	Receipt and review email from paralegal to Client (Discount: reduced by .10)	.10	85.00
	RRD	Draft [REDACTED] letter	.10	85.00
07/23/2019	JJI	Follow-up call with Crane re: additional documents with additional bonus of shares for performance	.10	69.50
	JJI	Call with Katz attorney for Rave and 5th Cir. Case (8:12 min)	.10	69.50
	JJI	Review 5th Cir Sellers case, and draft multiple rebuttal to Katz re: language and meaning of case & additional research	1.40	973.00
	JJI	2nd call with client re: Katz call (19:55 min)	.30	208.50
	JJI	3rd call with Katz re: demand letter (16:03 min)	.30	208.50
	JJI	15 emails re: update and status (Discount: reduced by 1.00)	.50	347.50
	JJI	Confer with atty Dunn regarding my call with Katz and his suggestions for next steps	.30	208.50
	RRD	Conference w/JJI re his call with Katz and my suggestions for strategy	.30	255.00
07/24/2019	JJI	Review multiple additional documents from client re: number of shares	.40	278.00
	JJI	10 emails re: stock and severance negotiations (Discount: reduced by .70)	.30	208.50
	JJI	Draft supplement to Demand Letter re: [REDACTED] shares and serve on Katz	.20	139.00
07/26/2019	JJI	19 emails re: status (Discount: reduced by 1.40)	.50	347.50
	JJI	Call with client re: stock, risks, and options (32:33 min)	.50	347.50

08/14/2019
Statement No: 1-3022

07/27/2019	BCC	Five emails with Atty. Iacuone regarding peer review and 2nd opinion (Discount: reduced by .40)	.10	60.00
	BCC	Multiple conferences with partner Iacuone regarding alternative language, client strategy and expected future steps [REDACTED] [REDACTED]	.60	360.00
	JJI	5 emails re: peer review and with M. Katz re: update (Discount: reduced by .40)	.10	69.50
	JJI	Conferences with atty Collins re: language, client strategy, and expected future steps [REDACTED]	.60	417.00
07/29/2019	BCC	13 emails with Partner and client regarding compensation and LTIP issues (Discount: reduced by .90)	.40	240.00
	BCC	Confer with partner regarding severance, release and compensation issues and identification of critical issues relevant to client's potential claims and strategy	.20	120.00
	BCC	Follow-up conference with partner regarding key documents, key language and additional facts [REDACTED] (24:17 min)	.40	240.00
	BCC	Review and careful analysis of client documentation including employment agreement, LTIP plan, LTIP award and proposed severance and release agreement and assessment of [REDACTED] [REDACTED] and additional information/Confirmations needed from client	2.90	1,740.00
	JJI	Meeting with Collins re: peer review/research	.20	139.00
	JJI	17 emails re: status of offers, Katz communications/strategy (Discount: reduced by 1.20)	.50	347.50
	JJI	Research latest [REDACTED] cases & review case law/analysis (Discount: reduced by .90)	1.60	1,112.00
	JJI	Draft lengthy update to Crane	.30	208.50
	JJI	2nd conference with atty Collins (24:17 min)	.40	278.00
07/30/2019	BCC	18 emails with client and partner regarding severance and release agreement, LTIP RSU awards, LTIP plan, underlying facts, and strategy (Discount: reduced by 1.30)	.50	300.00
	BCC	Review and assessment of additional client information and identification of issues to address with partner relating to the client response to the proposed settlement agreement and release and strategy going forward	.40	240.00
	BCC	Confer with partner regarding remaining issues to address with client and strategy (32:08 min)	.50	300.00
	BCC	Telephone conference with partner and client (BCC participation on the call from 1:35-2:39 min)	.70	420.00
	JJI	23 emails re: case law & review o/c cases (Discount: reduced by 1.70)	.60	417.00
	JJI	Analysis and review case law from opposing counsel	.20	139.00
	JJI	Conference with Collins re: next steps and strategy call (32:03 min) (Discount: reduced by .20)	.50	347.50
	JJI	Additional research re: bonus or stock [REDACTED] [REDACTED] & draft lengthy response to Katz (Discount: reduced by .90)	1.70	1,181.50
	JJI	Call with Collins and Crane (1:05:33 min)	1.10	764.50
	JJI	Draft the language to initial and revise Separation Agreement & Release	.60	417.00

Crane/Rave

Confidential

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08/14/2019

Statement No:

1-3022

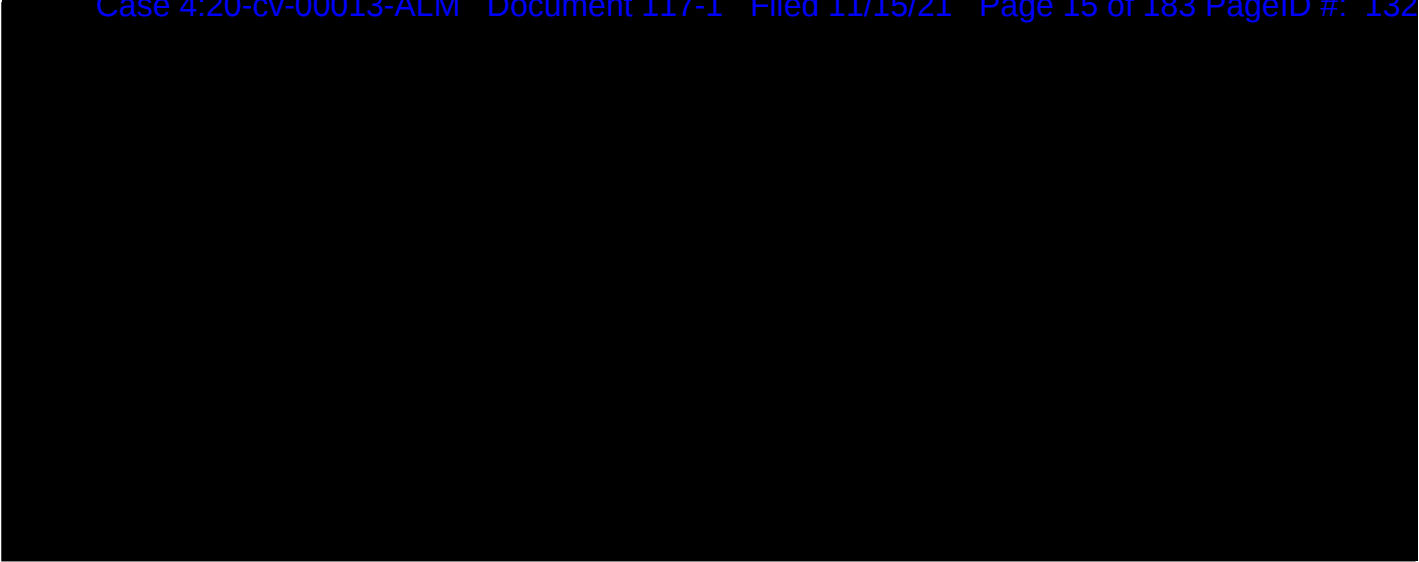
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JJI	Review Handbook [REDACTED]	.10	69.50
07/31/2019	BCC	22 emails with partner and client regarding strategy, [REDACTED] [REDACTED] existing separation agreement, and client breach of contract claims (Discount: reduced by 1.70)	.50 300.00
	BCC	Review and assessment of [REDACTED] existing separation agreement and release as well as client documentation for purposes of [REDACTED] [REDACTED]	.70 420.00
	BCC	Prepare [REDACTED] and revise same following conferences with partner	.40 240.00
	JJI	Multiple revisions; review docs for [REDACTED] Separation Agreement [REDACTED]	.90 625.50
	JJI	Multiple short calls with client re: update	.30 208.50
	JJI	Review 2019 Award Agreement	.10 69.50
	JJI	26 emails re: Release [REDACTED] (Discount: reduced by 1.90)	.70 486.50

TOTAL FOR CURRENT SERVICES RENDERED**32.60****21,523.50**RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
Connie Cashion	0.10	\$195.00	\$19.50
Bryan C. Collins	8.30	600.00	4,980.00
R. Rogge Dunn	1.00	850.00	850.00
Joshua J. Iacuone	22.30	695.00	15,498.50
Paralegal	0.70	195.00	136.50
Tina M. Vanderburg	0.20	195.00	39.00

TOTAL CURRENT CHARGES**21,523.50**





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

02/17/2020

Statement No: 2-3602

Matter ID: 7495-001

Your case name: Crane/Rave

FINAL BILL

Description of Legal Services

			Hours	
08/01/2019	JJI	4 emails re: paycheck and status (Discount: reduced by .20)	.20	139.00
08/02/2019	JJI	Call with client re: Chairman request for meeting & draft [REDACTED] to client	.30	208.50
08/03/2019	JJI	4 emails re: Katz and meeting (Discount: reduced by .20)	.20	139.00
08/04/2019	JJI	4 emails re: status (Discount: reduced by .30)	.10	69.50
08/05/2019	JJI	7 emails re: status and next steps (Discount: reduced by .40)	.30	208.50
	JJI	Call with Katz re: status (19:22 min)	.30	208.50
	JJI	Call with client re: issues and Katz conversation (14:22 min)	.20	139.00
	JJI	Confer with Dunn re: my call with Katz and next steps	.30	208.50
	RRD	Conference w/JJI re his call w/Katz and strategy (Discount: reduced by .30)		No/Chg
08/06/2019	JJI	Short call with client re: update	.10	69.50
	JJI	Review letter re: computers	.20	139.00

Crane/Rave

Confidential

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02/17/2020
2-3602

Statement No:

08/07/2019	JJI	31 emails re: status, computers, and filings (Discount: reduced by 2.30)	.80	556.00
	JJI	Brief research on diversity issue [REDACTED]	.20	139.00
	JJI	Draft response to computer letter, forward to client for approval, revisions and serve	.80	556.00
	JJI	Confer with Dunn re: computers and other issues (Discount: reduced by .20)		No/Chg
	RRD	Conference w/JJI re computers and other issues	.20	170.00
08/08/2019	JJI	Call with client re: Katz call and next steps (19:33 min)	.30	208.50
	JJI	Info to DLA Piper and answer questions re: documents including LTIP and measuring period	.20	139.00
	JJI	12 emails re: computers, status, settlement (Discount: reduced by .90)	.30	208.50
	JJI	Call with Katz re: status and computers (14:33 min)	.20	139.00
08/09/2019	JJI	Review computer letter, and draft letter back re: computer return issues	.40	278.00
	JJI	18 emails re: computer return & next steps (Discount: reduced by 1.30)	.50	347.50
	JJI	Call with Crane re: computer return (5:12 min)	.10	69.50
	JJI	Draft demand letter re: failure to pay severance per EA	.30	208.50
	JJI	Confer with Dunn re: LTIP and return of computer problems	.20	139.00
	RRD	Conference w/JJI re LTIP issues and return of computer issues	.20	170.00
08/10/2019	JJI	Review response letter to no severance and forward to client (Discount: reduced by .10)	.10	69.50
08/12/2019	JJI	4 emails re: status update with o/c and various issues (Discount: reduced by .30)	.10	69.50
08/15/2019	JJI	Call with Katz re: settlement status and notes	.20	139.00
	JJI	Call with Crane re: Katz and settlement update	.10	69.50
	JJI	Confer with Dunn re: settlement	.10	69.50
	RRD	Conference w/JJI re settlement [REDACTED]	.10	85.00
08/16/2019	JJI	Call to Katz re: mediation/settlement	.10	69.50
08/17/2019	JJI	4 emails re: Schwarz call (Discount: reduced by .20)	.20	139.00
08/18/2019	JJI	3 short calls with client re: Schwarz calls/threats	.30	208.50

02/17/2020
Statement No: 2-3602

08/19/2019	JJI	Call with client re: next steps as severance negotiations [REDACTED] (13:22 min)	.20	139.00
	JJI	Calls (2x) with Katz re: computer info. and settlement	.30	208.50
	JJI	13 emails re: computer & mediation (Discount: reduced by .90)	.40	278.00
	JJI	Confer with Dunn re: Client's property and personal file issues	.20	139.00
	RRD	Conference w/JJI re personal file issues and property belonging to Client	.20	170.00
	RRD	9 EM w/JJI and Client re draft of Hybrid rep agreement and personal files (Discount: reduced by .70)	.20	170.00
08/20/2019	JJI	Draft letter to Katz re: personal files	.40	278.00
	JJI	Call with Katz re: status & computer (6:05 min)	.10	69.50
	JJI	Call with Crane re: update (5:33 min)	.10	69.50
08/27/2019	JJI	Call to Katz re: personal docs	.10	69.50
02/11/2020	PAR	Office conference with Dunn regarding [REDACTED] file	.10	19.50
	PAR	Prepare materials and E-mails for [REDACTED]	.40	78.00
	RRD	Draft [REDACTED] letter to the Client	.10	85.00
	RRD	Ofc. confr. w/Paralegal re: [REDACTED] file [REDACTED] (Discount: reduced by .10)		No/Chg
TOTAL FOR CURRENT SERVICES RENDERED			11.00	7,550.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	1.00	\$850.00	\$850.00
Joshua J. Iacuone	9.50	695.00	6,602.50
Paralegal	0.50	195.00	97.50

Statement No: 02/17/2020
2-3602





500 N. AKARD ST., SUITE 1900
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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

02/17/2020

Statement No: 1-3603

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
08/28/2019	JJI	9 emails re: [REDACTED] and next steps (Discount: reduced by .60)	.30	75.00
	JJI	Meeting with Myers re: lawsuit, [REDACTED] and strategy (10:35 - 55)	.30	75.00
	JJI	Draft introductory email and directive on [REDACTED] and drafting petition/complaint	.10	25.00
	MHM	Conference with atty lacuone regarding lawsuit, [REDACTED] and next steps (10:35-10:55)	.30	75.00
08/29/2019	JJI	19 emails re: [REDACTED] and strategy & [REDACTED] (Discount: reduced by 1.20)	.70	175.00
	JJI	Call with client re: computer request (4:55 min)	.10	25.00
	JJI	Listen to Schwarz v-mail	.10	25.00
	MHM	Telephone conference call with client regarding [REDACTED] to diversity of citizenship jurisdiction.	.40	100.00
	MHM	Research [REDACTED]	.20	50.00
	MHM	Draft communication to Josh lacuone regarding general order [REDACTED]	.10	25.00
08/31/2019	JJI	2 emails w/Katz and client re: picking up of computer (Discount: reduced by .10)	.10	25.00

Statement No: 02/17/2020
1-3603

TOTAL FOR CURRENT SERVICES RENDERED	2.70	675.00
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
Joshua J. Iacuone	1.70	\$250.00	\$425.00
Michael Myers	1.00	250.00	250.00





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

02/18/2020

Statement No: 2-3605

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
09/03/2019	JJI	12 emails re: Crane picking up/deletion personal data (Discount: reduced by .70)	.50	125.00
	JJI	Directive to Myers for to-dos	.10	25.00
	JJI	Follow-up call w/Crane re: [REDACTED] (6:50 min)	.10	25.00
	JJI	Confer with Dunn re: Client's to do list and gameplan moving forward	.20	50.00
	RRD	Conference w/JJI To Do List for Client and next steps	.20	50.00
09/11/2019	JJI	Call with client re: status update (10:44 min)	.20	50.00
09/17/2019	JJI	Client update re: [REDACTED] & status (5:33 min)	.10	25.00
09/19/2019	JJI	Call with Crane re: status (2:25 min)	.10	25.00
09/26/2019	JJI	Email and call to client re: status (Discount: reduced by .10)	.10	25.00
09/30/2019	JJI	9 emails re: status and Complaint (Discount: reduced by .60)	.30	75.00
	MHM	Telephone conference call regarding [REDACTED]	.20	50.00

Crane/Lawsuit

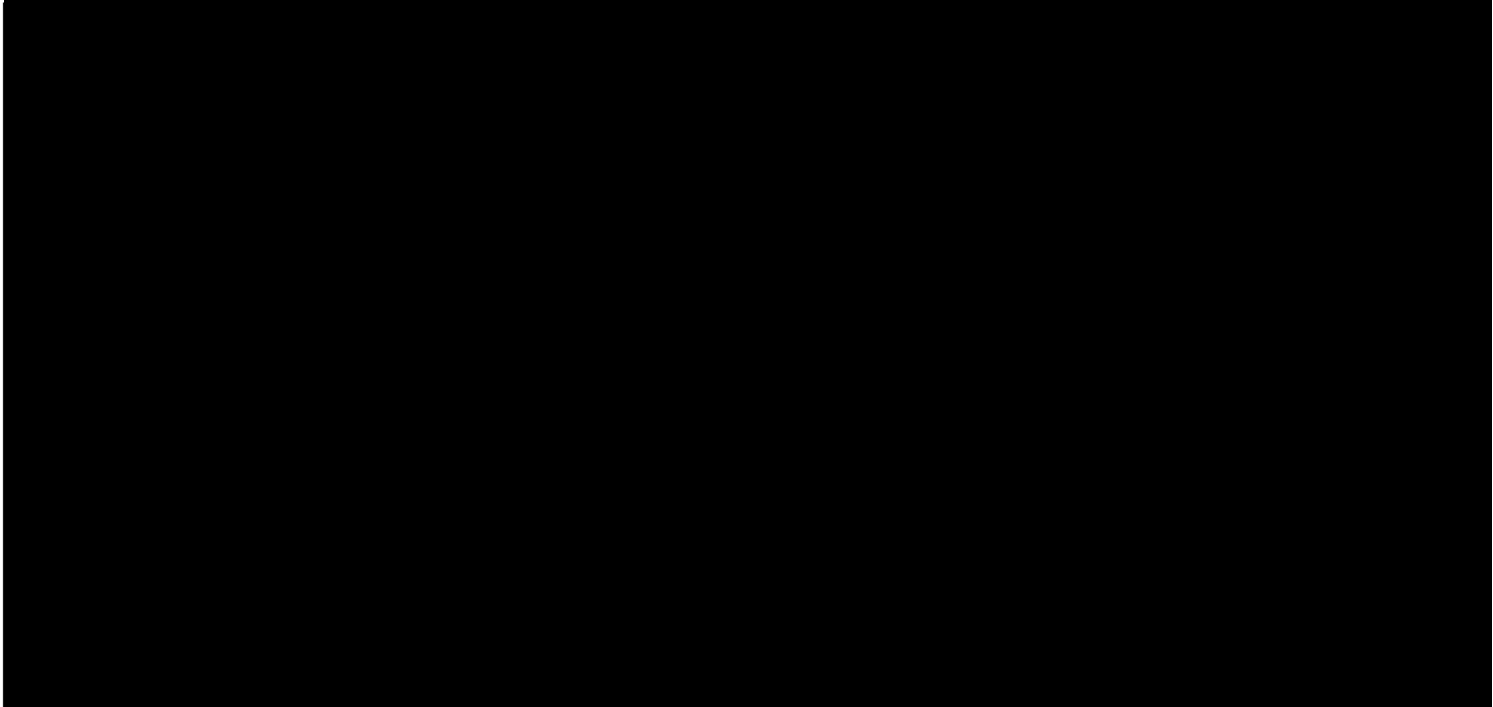
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Statement No: 02/18/2020
2-3605MHM Draft communication to lead counsel regarding steps client [REDACTED] .20 50.00
[REDACTED]

TOTAL FOR CURRENT SERVICES RENDERED 2.30 575.00RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.20	\$250.00	\$50.00
Joshua J. Iacuone	1.70	250.00	425.00
Michael Myers	0.40	250.00	100.00





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

02/20/2020

Statement No: 3-3606

Matter ID: 7495-002

Your case name: Crane/Lawsuit

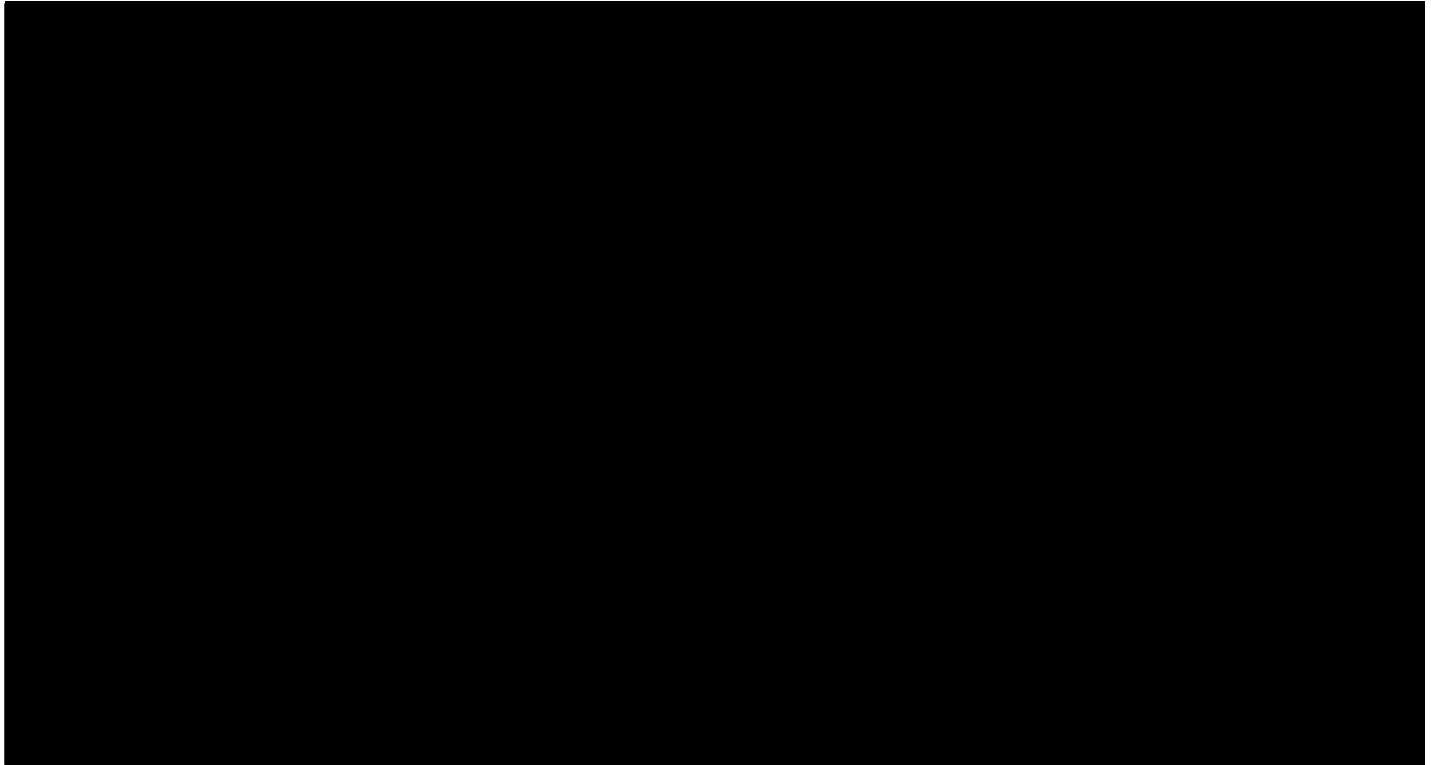
Description of Legal Services

			Hours	
10/11/2019	JJI	Review file/status, and directive on moving forward with complaint/timing, and 4 emails re: same (Discount: reduced by .30)	.20	50.00
10/14/2019	JJI	Update TDL	.20	50.00
10/17/2019	JJI	3 emails re: status of [REDACTED] for federal court filing (Discount: reduced by .20)	.10	25.00
	JJI	Confer with Dunn re: [REDACTED] gameplan [REDACTED]	.20	50.00
	RRD	Conference w/JJI re [REDACTED] strategy [REDACTED]	.20	50.00
10/19/2019	JJI	Short update call from client	.10	25.00
TOTAL FOR CURRENT SERVICES RENDERED			1.00	250.00

Statement No: 02/20/2020
3-3606

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.20	\$250.00	\$50.00
Joshua J. Iacuone	0.80	250.00	200.00





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

02/20/2020

Statement No: 4-3613

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	No/Chg
11/04/2019	JJI	Review [REDACTED] (Discount: reduced by .10)		No/Chg
	MHM	Receive [REDACTED] from client. (Discount: reduced by .10)		No/Chg
11/05/2019	JJI	2 emails re: venue facts & complaint (Discount: reduced by .10)	.10	25.00
11/06/2019	JJI	3 emails re: [REDACTED] and filing suit (Discount: reduced by .20)	.10	25.00
11/09/2019	JJI	Email re: [REDACTED]	.10	25.00
11/10/2019	JJI	4 emails re: [REDACTED] (Discount: reduced by .30)	.10	25.00
	JJI	3 emails re: complaint and status (Discount: reduced by .20)	.10	25.00
11/15/2019	JJI	4 emails re: complaint and next steps (Discount: reduced by .20)	.20	50.00
	JJI	Call with client re: status (12:22 min)	.20	50.00
	MHM	Email communication to lead counsel regarding chronology.	.10	25.00
	MHM	Draft communication to client regarding chronology.	.10	25.00

Statement No: 02/20/2020
4-3613

11/21/2019	JJI	2 emails re: Complaint status and background facts (Discount: reduced by .10)	.10	25.00
11/25/2019	JJI	7 emails re: facts for Complaint and next steps (Discount: reduced by .40)	.30	75.00
	MHM	Per Dunn, draft original complaint versus Rave Restaurant Group, Inc.	2.70	675.00
	MHM	Telephone conference with client regarding specific performance and [REDACTED]	.20	50.00
	MHM	Draft communication to client regarding number of shares he was entitled to receive.	.10	25.00
	MHM	Draft communication to client regarding whether [REDACTED]	.10	25.00
	MHM	Confer with atty Dunn regarding next steps for complaint	.30	75.00
	RRD	Conference w/MHM re strategy for complaint and [REDACTED]	.30	75.00
11/26/2019	JJI	6 emails re: Complaint status (Discount: reduced by .40)	.20	50.00

TOTAL FOR CURRENT SERVICES RENDERED**5.40 1,350.00**RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.30	\$250.00	\$75.00
Joshua J. Iacuone	1.50	250.00	375.00
Michael Myers	3.60	250.00	900.00

Statement No: 02/20/2020
4-3613





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

02/27/2020

Statement No: 5-3637

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
12/01/2019	JJI	3 emails re: complaint, review and filing (Discount: reduced by .20)	.10	25.00
12/02/2019	JJI	Review and revise draft Complaint	1.40	350.00
	JJI	Legal research for Complaint insertions etc.	.80	200.00
	JJI	Confer with Dunn regarding legal research and next steps	.30	75.00
	MHM	Per Dunn, review legal research related to quantum merit, money had and received, conversion, negligent misrepresentation, unjust enrichment, and fraudulent inducement.	.80	200.00
	MHM	Review revisions to complaint by atty lacuone	.40	100.00
	RRD	Conference w/JJI re legal research to be done and strategy and issues	.30	75.00
12/03/2019	JJI	Strategy meeting with Myers (2:20-2:57)	.60	150.00
	MHM	Strategy meeting with atty lacuone (2:20-2:57)	.60	150.00
12/04/2019	JJI	7 emails re: Complaint and status (Discount: reduced by .40)	.30	75.00
	MHM	Telephone conference with client regarding requirements for pleading fraudulent inducement as well as correcting certain factual statements made in the first draft of the original complaint	.30	75.00

Statement No: 02/27/2020
5-3637

12/05/2019	MHM	7 emails to lead counsel regarding status of filing complaint. (Discount: reduced by .40)	.30	75.00
	MHM	Finish review of Seller's case.	.60	150.00
	MHM	Make additional revisions to original complaint based on information obtained from client, [REDACTED] and adding a claim for fraudulent inducement.	1.10	275.00
	MHM	Draft communication to client requesting additional information related to conversations with Mark Schwarz regarding [REDACTED]	.20	50.00
	MHM	Confer with atty Dunn regarding his expertise regarding edits to complaint	.20	50.00
	RRD	Review complaint, draft, and analyze	.20	50.00
	RRD	Conference w/MHM re my suggested edits to complaint	.20	50.00
12/06/2019	JJI	Review latest Complaint draft version (Discount: reduced by .20)	.20	50.00
	JJI	(11:30) call with Scott re: Complaint status	.20	50.00
12/07/2019	JJI	5 emails re: Complaint status & client [REDACTED] (Discount: reduced by .30)	.20	50.00
	JJI	Call with client re: Shaw and finalizing complaint	.20	50.00
12/09/2019	BPS	Strategise with Mr. Iaucone regarding complaint, etc	.40	100.00
	JJI	Strategise with atty Shaw re: complaint and issues	.40	100.00
12/11/2019	BPS	Continue drafting complaint; texts with Iacuone regarding strategy; continue drafting amended complaint; review statutory fraud statute	1.90	475.00
	JJI	Texts with atty Shaw (Discount: reduced by .20)	.10	25.00
12/12/2019	BPS	Continue review and revisions to complaint; email to Mr. Iaucone regarding pleading strategy; 8 emails with client; telephone call to same; research issues on domicile; revise complaint (Discount: reduced by .50)	2.20	550.00
	BPS	Eight emails regarding complaint and next steps (Discount: reduced by .50)	.30	75.00
	JJI	Review latest Shaw draft	.20	50.00
	JJI	8 emails re: complaint and strategy (Discount: reduced by .50)	.30	75.00
12/16/2019	BPS	Review and revise complaint; email to client regarding strategy	.40	100.00
	MHM	Receive communication from co-counsel related to damage calculation for fraud. (Discount: reduced by .10)		No/Chg
	MHM	Review petition and Rave Restaurant Group website and draft communication to co-counsel regarding damage number.	.20	50.00
12/18/2019	JJI	Review 7 emails w/info. from client for possible fraud & additional documents found by client (Discount: reduced by .60)	.20	50.00

Statement No: 02/27/2020
5-3637

12/21/2019	JJI	Call with Crane re: update/next steps	.20	50.00
	JJI	Confer with Dunn re: my call with Client	.10	25.00
	RRD	Conference w/JJI re his call w/Client	.10	25.00
12/22/2019	BPS	Review email from client (Discount: reduced by .10)		No/Chg
12/23/2019	JJI	3 emails re: fraud and that [REDACTED] (Discount: reduced by .20)	.10	25.00
12/29/2019	BPS	4 emails with Client and atty Iacuone regarding filing complaint and fraud issues (Discount: reduced by .30)	.10	25.00
	JJI	4 emails w/client & Shaw re: filing complaint & fraud issues (Discount: reduced by .30)	.10	25.00
TOTAL FOR CURRENT SERVICES RENDERED			16.80	4,200.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.80	\$250.00	\$200.00
Joshua J. Iacuone	6.00	250.00	1,500.00
Michael Myers	4.70	250.00	1,175.00
Brian P. Shaw	5.30	250.00	1,325.00

Statement No: 02/27/2020
5-3637





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

04/26/2020

Statement No: 6-3829

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
01/02/2020	JJI	Put together agenda for meeting	.10	25.00
	JJI	9 emails re: status of suit/next steps (Discount: reduced by .50)	.40	100.00
01/03/2020	BPS	Confer with Josh regarding strategy; review and revise complaint; review previous emails sent by client regarding fraud; review employment agreement; further revisions to complaint; 6 emails with Team and Client regarding same (Discount: reduced by .40)	1.50	375.00
	JJI	6 emails re: status of case (Discount: reduced by .40)	.20	50.00
	JJI	Meeting w/Shaw re: fraud claims/when to file and strategy	.20	50.00
01/06/2020	BPS	Strategise with laucone regarding complaint; research and review client documents for complaint; telephone call with client; finalize complaint; review local rules; calls with client; finalize and file complaint; 20 + emails with Dunn regarding strategy (Discount: reduced by 1.50)	2.60	650.00
	BPS	Confer with Dunn [REDACTED] and gameplan	.40	100.00
	JJI	Research fraudulent inducement current Texas case law & review current draft of Complaint & approve for filing	.80	200.00
	JJI	Review filed Complaint, and email to Katz re: accepting service	.20	50.00
	JJI	23 emails re: Complaint, legal issues (Discount: reduced by 1.50)	.80	200.00
	RRD	Conference w/BPS re strategy and suggested gameplan re my	.40	100.00

Crane/Lawsuit

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Statement No: 04/26/2020
6-3829

experience [REDACTED]

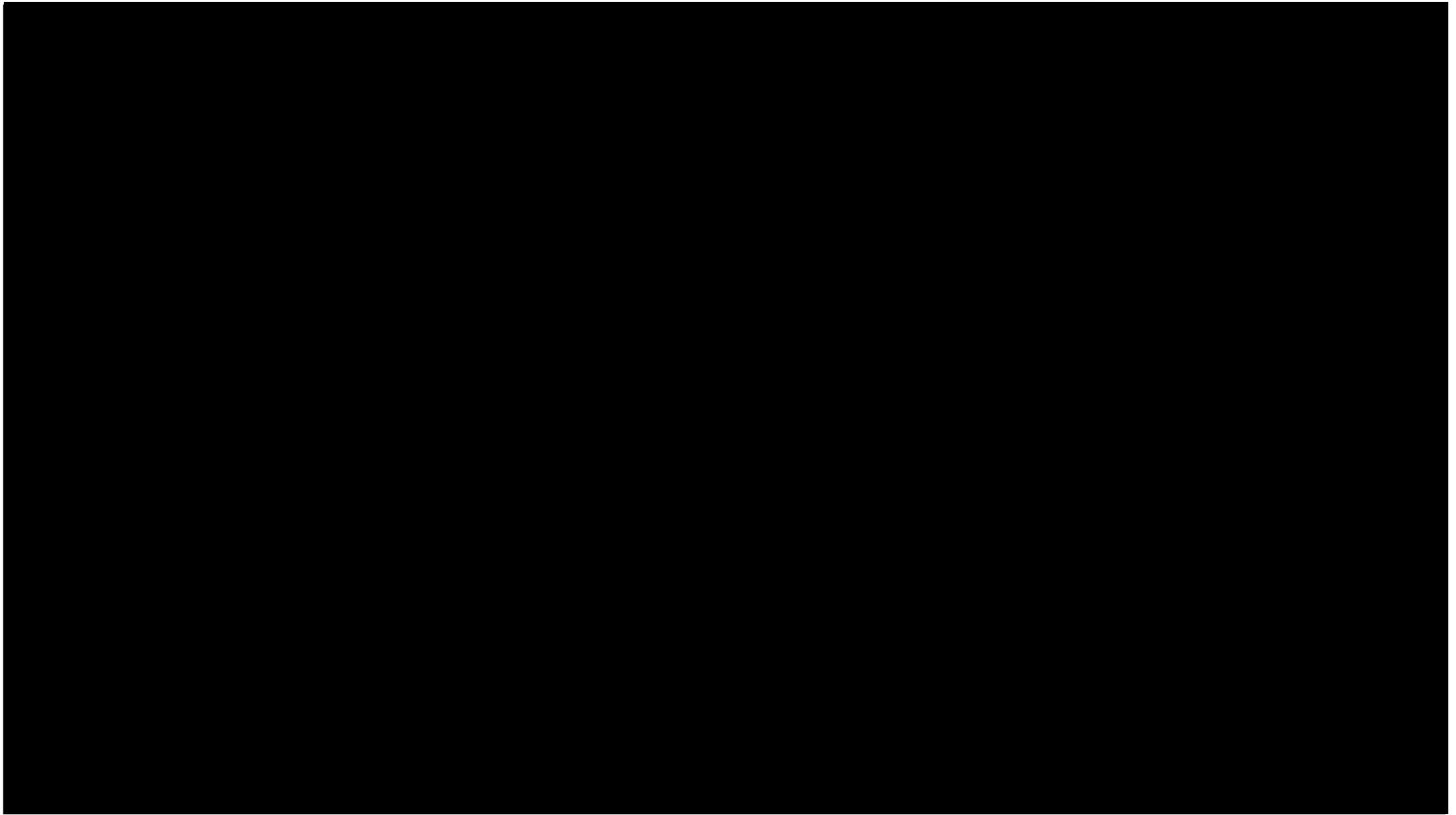
01/07/2020	BPS	Email from OC; emails with client; emails with Iacuone regarding legal strategy and research	.40	100.00
	JJI	12 emails re: accepting service (Discount: reduced by .80)	.40	100.00
	JJI	Research and fill-out waiver of service form to forward to Katz	.20	50.00
01/09/2020	JJI	Finalize waiver form	.20	50.00
	JJI	EM to Atty Katz (Discount: reduced by .10)		No/Chg
01/10/2020	RRD	EM from court re waiver of service	.10	25.00
01/17/2020	JJI	2 emails re: status w/client (Discount: reduced by .20)		No/Chg

TOTAL FOR CURRENT SERVICES RENDERED			8.90	2,225.00
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.50	\$250.00	\$125.00
Joshua J. Iacuone	3.50	250.00	875.00
Brian P. Shaw	4.90	250.00	1,225.00

Statement No: 04/26/2020
6-3829





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

05/15/2020

Statement No: 7-3914

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
02/07/2020	JJI	3 emails and notices re: counsel (Discount: reduced by .20)	.10	25.00
	RRD	3 EMs from Court re case activities (Discount: reduced by .20)	.10	25.00
02/12/2020	JJI	2 emails re: lawsuit in 10-Q (Discount: reduced by .10)	.10	25.00
	JJI	Confer with Dunn regarding 10-Q and gameplan	.10	25.00
	RRD	Conference w/JJI re status and 10-Q	.10	25.00

TOTAL FOR CURRENT SERVICES RENDERED

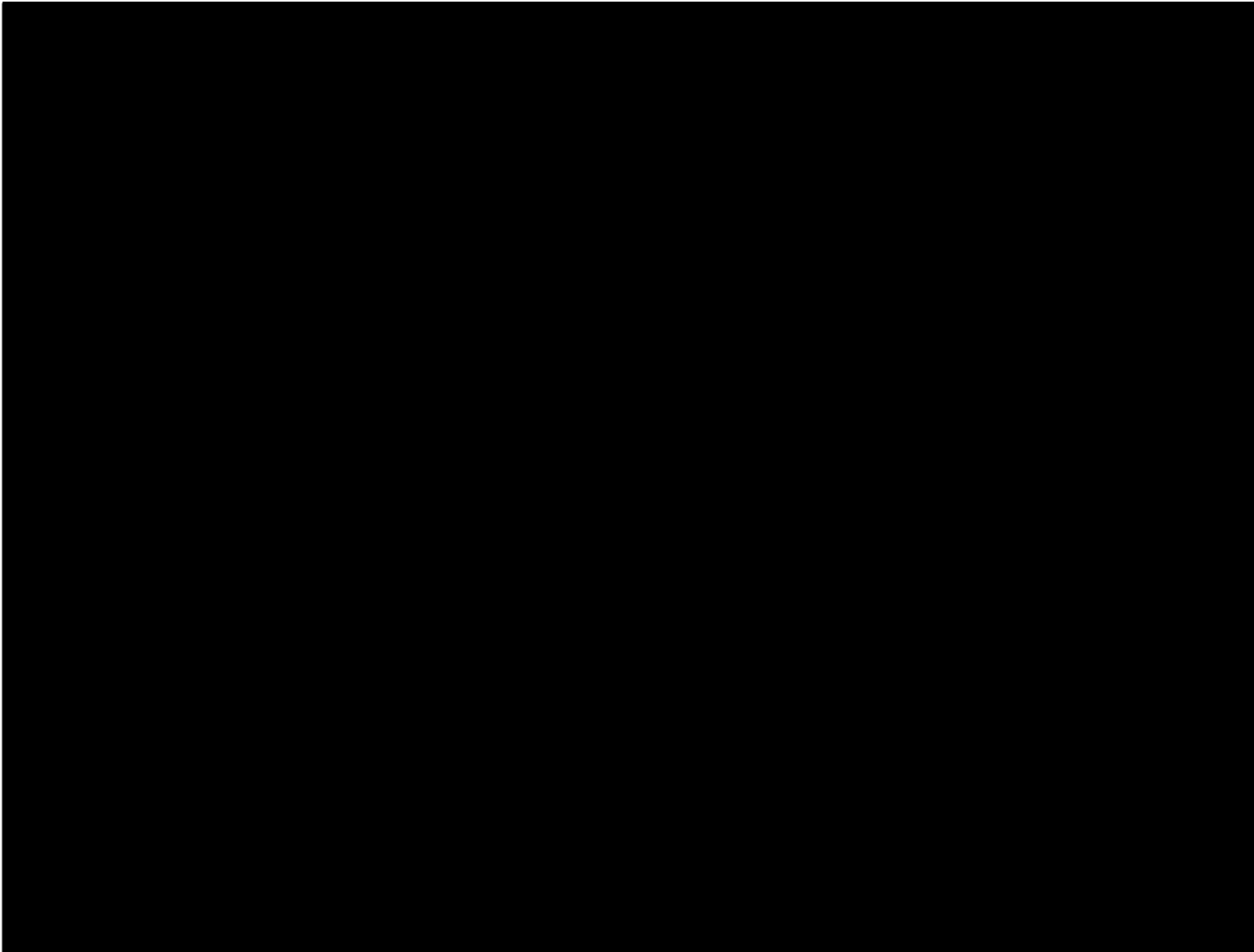
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125.00

RECAPITULATION

TIMEKEEPER	HOURS	RATE	TOTAL
R. Rogge Dunn	0.20	\$250.00	\$50.00
Joshua J. Iacuone	0.30	250.00	75.00

Statement No: 05/15/2020
7-3914





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

05/19/2020

Statement No: 8-3925

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

				Hours	
03/05/2020	BPS	10 + emails from new OC; emails with client (Discount: reduced by .70)	.30	75.00	
	BPS	Conference with JJI regarding Katz withdrawal	.40	100.00	
	BPS	Confer with Dunn regarding new counsel and gameplan moving forward and his extensive experience with Rave's new atty	.30	75.00	
	JJI	14 emails re: Gary Fowler appearance (Discount: reduced by .90)	.50	125.00	
	MP	Receipt of new file assignment, review of file materials and coordination with Attorney of tasks to be completed	.50	42.50	
	RRD	5 EMs w/Atty Fowler re new counsel (Discount: reduced by .30)	.20	50.00	
	RRD	Conference w/BPS re the numerous cases I had w/Rave's new atty and [REDACTED] and suggested strategies	.30	75.00	
03/06/2020	JJI	Review Motion to Dismiss	.30	75.00	
	JJI	Confer with Dunn re: MTD	.20	50.00	
	RRD	4 EMs from Court re Court filings, dismissal, and actions (Discount: reduced by .30)	.10	25.00	
	RRD	Conference w/JJI re dismissal motion strategy	.20	50.00	
03/09/2020	BPS	Review motion to dismiss and supporting docs; emails with client regarding same; strategise with Dunn; review reassignment of case	.30	75.00	

Statement No:

05/19/2020
8-3925

	JJI	17 emails re: MTD (Discount: reduced by 1.20)	.50	125.00
	MP	Receipt and review of Motion to Dismiss with Exhibits filed by Defendant Rave and calculate and calendar deadline for response to Motion and "tickler" reminders	.30	25.50
	MP	Two EMs with Attorneys re calculation and calendaring of deadline to respond to Motion to Dismiss (Discount: reduced by .10)	.10	8.50
	MP	Receipt and review of Notice of Appearance of attorney for Defendant Rave Restaurant Group and update to docket sheet with same	.20	17.00
	MP	Receipt of Def Rave's Unopposed Motion to Substitute Counsel and proposed Order granting same	.20	17.00
	MP	Receipt and review of file-stamped copy of Def Rave's Disclosure Statement	.10	8.50
	RRD	3 EMs w/Rave's Atty (Discount: reduced by .20)	.10	25.00
	RRD	Review Rave's disclosure and Judge appointed	.10	25.00
	RRD	5 emails/court notification re: reassignment of Judge, Notice of Appearance of Fowler, Motion to Substitute Counsel and Rave's Disclosure statement (Discount: reduced by .30)	.20	50.00
	RRD	Conference w/BPS re strategy	.20	50.00
03/11/2020	MP	(Rave) Receipt and review of signed Order granting Motion to Substitute Attorney	.10	8.50
	RRD	Review order re substitution of counsel (Discount: reduced by .10)		No/Chg
	RRD	2 emails/court notification re: Order granting Motion to substitute attorneys, updated docket sheet (Discount: reduced by .10)	.10	25.00
03/12/2020	JJI	Voicemail to Client (Discount: reduced by .10)		No/Chg
	JJI	Email with Client	.10	25.00
03/13/2020	JJI	Call re: status, etc. (11:35 min)	.20	50.00
	JJI	Confer with Dunn regarding gameplan	.10	25.00
	RRD	Conference w/JJI re status	.10	25.00
03/20/2020	BPS	Review and analyze motion to dismiss for purposes of drafting response; conduct legal research regarding same; continue drafting response to MTD	2.90	725.00
	JJI	5 emails re: MTD and strategy (Discount: reduced by .30)	.20	50.00
	JJI	Review notice of pre-hearing on discovery	.10	25.00
03/23/2020	JJI	2 emails re: MTD status (Discount: reduced by .10)	.10	25.00
	MP	(Rave) Two EMs with Attorney and Paralegal re status of file and deadline to file response to Def Rave's Motion to Dismiss (Discount: reduced by .10)	.10	8.50
03/24/2020	BPS	Emails with JJI regarding strategy; TC with same; draft motion and order granting same; brief research on motion issues	2.00	500.00

Statement No:

05/19/2020
8-3925

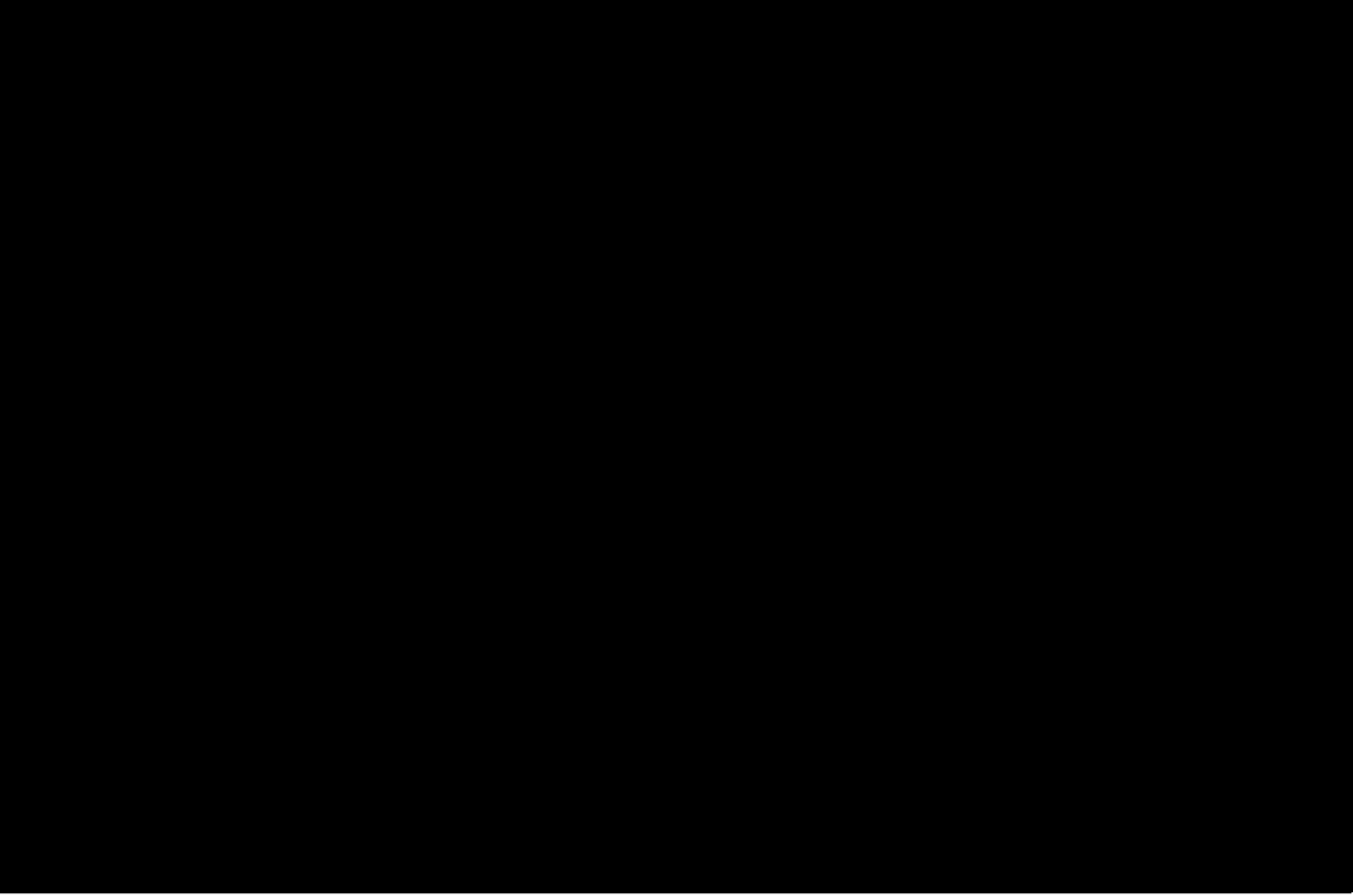
	JJI	17 emails re: status of Response to MTD (Discount: reduced by 1.20)	.50	125.00
	JJI	Review Court's order for scheduling, and other deadlines & have docketed	.20	50.00
	JJI	Review local rules and draft email requesting extension for MTD response	.10	25.00
	JJI	Review motion for extension for MTD Response (Discount: reduced by .10)		No/Chg
	MP	(Rave) Coordination with Attorneys and Paralegal re reminder of upcoming deadline to file response to Def Rave's Motion to Dismiss	.20	17.00
	MP	(Rave) Receipt, review and calculation of deadlines on signed Scheduling Order and "tickler" email reminders	.50	42.50
	MP	(Rave) Seven EMs with Attorneys and Opposing Counsel re request for Motion to Dismiss extension and coordination of tasks re docs to file re same (Discount: reduced by .50)	.20	17.00
	RRD	9 emails with Iacuone, o/c, Shaw, Fowler and para Pounds re: extension of deadline, to respond to Motion to Dismiss (Discount: reduced by .60)	.30	75.00
	TMV	9 email swith team and Fowler re: extension and update of new deadline on calendar (Discount: reduced by .60)	.30	25.50
03/25/2020	BPS	Review and revise order and motion for extension of time to respond to MTD; emails with OC regarding same; revise motion and file with court via ECF	.90	225.00
	JJI	4 emails re: extension and status (Discount: reduced by .30)	.10	25.00
	MP	Three EMs with Attorneys and Opposing Counsel re drafting and filing of Motion for Extension to File Response to Motion to Dismiss and Order granting same (Discount: reduced by .20)	.10	8.50
	RRD	EM from Court (Discount: reduced by .10)		No/Chg
	RRD	4 emails with Clients, Shaw and o/c re: unopposed motion for extension of time (Discount: reduced by .30)	.10	25.00
	TMV	11 emails with team and o/c and work on revisions to Motion for Extension to file Motion to Dismiss and Proposed Order (Discount: reduced by .80)	.30	25.50
03/26/2020	JJI	Review Court granting extension request Order (Discount: reduced by .10)		No/Chg
	JJI	3 emails re: extension order request (Discount: reduced by .20)	.10	25.00
	MP	(Rave) Receipt and review of signed Order granting Plaintiff's Unopposed Motion for Extension of Time and updating calendar reflecting same	.40	34.00
	RRD	EMs (2x) w/para and Court (Discount: reduced by .10)	.10	25.00
	RRD	2 emails/court notifications re: Order on Unopposed Motion for Time Extension to respond to Motion to Dismiss (Discount: reduced by .10)	.10	25.00
	TMV	Receipt and review of Court communication, login to Court website, review, organize and analyze e-filed Order Granting Motion for Extension of Time to File Response re: Motion to Dismiss	.20	17.00
03/27/2020	JJI	3 emails re: extension and Response (Discount: reduced by .30)		No/Chg

Statement No: 05/19/2020
8-3925

TOTAL FOR CURRENT SERVICES RENDERED	16.40	3,473.00
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	2.20	\$250.00	\$550.00
Joshua J. Iacuone	3.30	250.00	825.00
Misty Pounds	3.00	85.00	255.00
Brian P. Shaw	7.10	250.00	1,775.00
Tina M. Vanderburg	0.80	85.00	68.00





500 N. AKARD ST., SUITE 1900
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(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT **ATTORNEY/CLIENT COMMUNICATION**

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

05/20/2020

Statement No: 9-3926

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
04/01/2020	JJI	Review notice and 3 emails re: Response deadline (Discount: reduced by .20)	.10	25.00
	MP	Three EMs with Attorneys and Paralegal re upcoming D/L to file Response to Def Rave's Motion to Dismiss and coordination of tasks re same (Discount: reduced by .20)	.10	8.50
04/02/2020	BPS	Continue drafting response to MTD; continue legal research regarding same	2.30	575.00
04/03/2020	BPS	Continue drafting and research of response to MTD	5.00	1,250.00
	BPS	Confer with Dunn regarding dismiss motion	.30	75.00
	RRD	Conference w/BPS re MTN to dismiss issues	.30	75.00
04/05/2020	JJI	2 emails re: Response to 12(b)(6) (Discount: reduced by .10)	.10	25.00
04/06/2020	BPS	Continue drafting and research of response to MTD; TC and emails with JJI and team regarding same; draft proposed order; review and revise response; emails with team; continue review and revisions to agreement to finalize for filing; file via ECF	7.40	1,850.00
	JJI	22 emails re: 12(b)(6) Response filing (Discount: reduced by 1.60)	.60	150.00

			Statement No:	05/20/2020 9-3926
	JJI	Review 12(b)(6) Response and redline/revise	1.80	450.00
	RRD	Receipt and review court notification re: Response in Opposition to Motion to Dismiss	.10	25.00
	TMV	30+ emails with team and work on edits to Crane's response to Motion to Dismiss (Discount: reduced by 2.20)	.80	68.00
04/07/2020	BPS	Review of filed response; review scheduling order; emails with JJI and OC regarding Rule 26 conference; revise order and email to clerk; emails with OC	.40	100.00
	JJI	13 emails re: initial conference with opposing counsel (Discount: reduced by .90)	.40	100.00
	MP	Two EMs with Attorney and Paralegal re upcoming D/L for Rule 26(f) Attorney Conference and coordination of tasks re same (Discount: reduced by .10)	.10	8.50
	MP	Schedule Zoom call for Rule 26 Conference, calendar invite and circulate info to all counsel	.30	25.50
	MP	Two EMs with Attorney re scheduling of Zoom Conf call for Rule 26 Conference and coordination of tasks re same (Discount: reduced by .10)	.10	8.50
	MP	Draft email to Court Clerk re resetting DWOP hearing for 30 days and details on Court procedures to handle same.	.20	17.00
	MP	Four EMs with Attorney re contacting Court to reset DWOP hearing for 30 days and coordination of tasks re same (Discount: reduced by .20)	.20	17.00
	MP	Receipt of Notice from Court resetting DWOP hearing and update calendar to reflect same and "tickler" reminders	.20	17.00
	MP	Four EMs with Attorney and Court Clerk re DWOP hearing being reset and new notice reflecting same (Discount: reduced by .20)	.20	17.00
	TMV	Email with team re: upcoming deadline for Rule 26(f) Conference (Discount: reduced by .10)		No/Chg
04/08/2020	MP	Schedule Zoom Conference call for upcoming Rule 26 Conference and forward meeting invitation to all parties	.20	17.00
04/10/2020	JJI	3 emails re: Reply and unopposed (Discount: reduced by .20)	.10	25.00
	RRD	2 emails with lacuone and o/c re: Motion to exceed 5 page limit on Reply Brief (Discount: reduced by .20)		No/Chg
	TMV	3 emails with team and o/c re: reply brief to Motion to Dismiss (Discount: reduced by .20)	.10	8.50
04/13/2020	BPS	Rule 26(f) conference; receive and review reply; email to JJI regarding same	.80	200.00
	JJI	Call for 26(f) conference (1:30 - 1:47)	.30	75.00
	JJI	Review Reply in support of MTD	.40	100.00
	JJI	9 emails re: Sur Reply and conference (Discount: reduced by .60)	.30	75.00
	RRD	4 court notifications and emails with lacuone and o/c re; conference and Reply to response to Motion to Dismiss (Discount: reduced by .30)	.10	25.00
	TMV	3 emails with team and McElhaney re: conference call (Discount: reduced by .20)	.10	8.50

Statement No:

05/20/2020
9-3926

04/14/2020	JJI	Review local rules for sur-reply, deadline, etc. and circulate to team	.20	50.00
	JJI	Review order granting excess page for Reply	.10	25.00
	JJI	7 emails re: motion & orders (Discount: reduced by .40)	.30	75.00
	JJI	Confer with Dunn regarding Rule 26 and strategy	.20	50.00
	RRD	Receipt and review 4 emails with team and court notification re: Order on Motion for Leave, reply brief in support of Motion to Dismiss and order granting motion for leave (Discount: reduced by .20)	.20	50.00
	RRD	Conference w/JJI re results of Rule 26 conference and gameplan	.20	50.00
04/15/2020	JJI	4 emails re: 26(f) report (Discount: reduced by .30)	.10	25.00
	JJI	Review Rave draft 26(f) and input re: same	.20	50.00
04/16/2020	BPS	Begin drafting sur-reply to motion to dismiss; begin research on same; continue drafting sur reply	2.10	525.00
04/17/2020	JJI	11 emails re: Sur-Reply and filings (Discount: reduced by .60)	.50	125.00
	JJI	Draft & revise sur-reply & instructions on filing	.80	200.00
	TMV	6 emails with Shaw and lacuone re: upcoming deadline, preparation of Sur-Reply and local rules (Discount: reduced by .40)	.20	17.00
04/20/2020	RRD	Receipt and review court notification re: filing of sur-reply (Discount: reduced by .10)		No/Chg
	TMV	4 emails with Shaw and court notification re: Sur-Reply to Motion to Dismiss (Discount: reduced by .30)	.10	8.50
	TMV	Review, finalize, format, convert and e-file Sur-Reply	.30	25.50
04/22/2020	BPS	Review and revise Rule 26 report; emails with JJI; emails with OC; emails with client; emails with OC	.80	200.00
	JJI	14 emails re: deadline, report, etc (Discount: reduced by 1.00)	.40	100.00
04/23/2020	BPS	Emails with JJI; review and revise draft report; email to OC regarding same; draft initial disclosures; emails with client and JJI regarding same; finalize and file R26(f) conference and file same; finalize initial disclosures and serve same; email to OC; emails with JJI and paralegal regarding doc production; review local rules; draft notice of compliance with R 26; file same via ECF	2.60	650.00
	BPS	Confer with Dunn regarding gameplan	.20	50.00
	JJI	36 emails re: disclosures etc. (Discount: reduced by 2.60)	1.00	250.00
	JJI	Review Rave initial disclosures and forward to client	.20	50.00
	RRD	10 emails with team and court notifications re: Initial disclosures, Notice of Service, Report of Rule 26 conference and document production (Discount: reduced by .70)	.30	75.00
	RRD	Conference w/BPS re update status and issues	.20	50.00

Statement No:

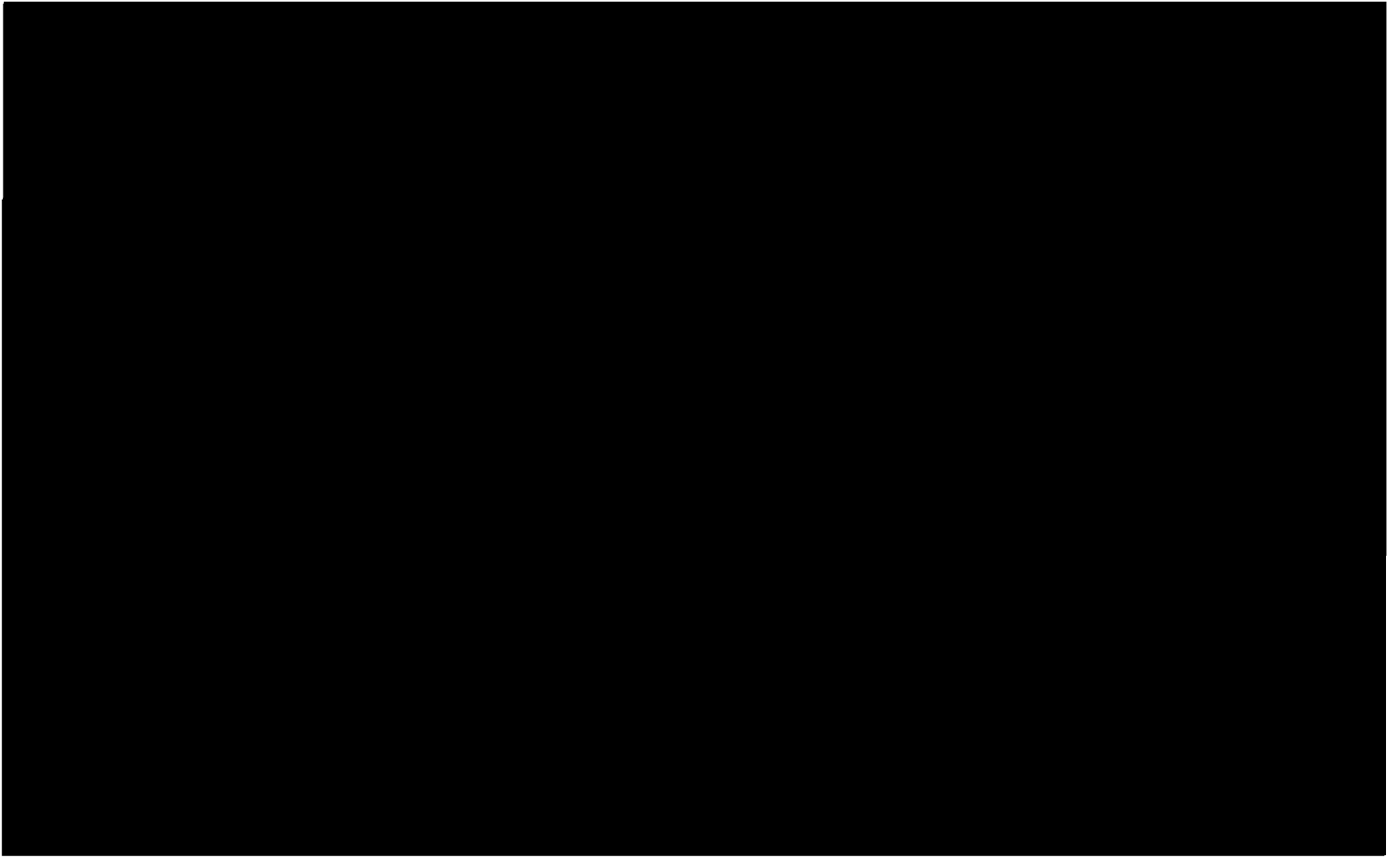
05/20/2020
9-3926

	TMV	12 emails with McElhaney, Iacuone, Crane and Shaw re: Rave's disclosures, preparation of Crane's disclosures, compliance notice (Discount: reduced by .80)	.40	34.00
04/24/2020	BPS	TC with Crane regarding discovery responses	.20	50.00
	JJI	7 emails re: meeting and discovery/docs (Discount: reduced by .40)	.30	75.00
	JJI	(11:44) call with client re: status and next steps	.20	50.00
	TMV	Update calendar and email "tickler" reminders	.20	17.00
	TMV	2 emails with Shaw and Iacuone re; upcoming deadline (Discount: reduced by .10)	.10	8.50
04/27/2020	BPS	Email from court regarding scheduling order; review order from court regarding proceedings; respond to email from clerk; review local rules; work on issues related to the production of documents; email to court regarding scheduling order	1.10	275.00
	JJI	12 emails re: scheduling order and next steps (Discount: reduced by .80)	.40	100.00
	MP	Review docs received from Client and organize all pdf's to prepare for attorney review for upcoming document production	.50	42.50
	MP	Receipt, download and save docs produced by Def Rave along with their Initial Mandatory Disclosures to file	.40	34.00
04/29/2020	JJI	2 emails re: docs and witnesses (Discount: reduced by .20)		No/Chg
04/30/2020	BPS	Compile and review document production required by ED Local Rules and Rule 26; redact same; emails with client; email to OC regarding same	1.30	325.00
	JJI	8 emails re: production (Discount: reduced by .50)	.30	75.00
TOTAL FOR CURRENT SERVICES RENDERED			40.00	9,208.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	1.40	\$250.00	\$350.00
Joshua J. Iacuone	9.30	250.00	2,325.00
Misty Pounds	2.50	85.00	212.50
Brian P. Shaw	24.50	250.00	6,125.00
Tina M. Vanderburg	2.30	85.00	195.50

Statement No: 05/20/2020
9-3926





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT **ATTORNEY/CLIENT COMMUNICATION**

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

06/07/2020

Statement No: 10-3966

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

				Hours	
05/04/2020	BPS	Review docket entry cancelling in-person scheduling conference	.10	25.00	
	JJI	5 emails re: management conference with Court (Discount: reduced by .30)	.20	50.00	
	RRD	Receipt and review court notification re: cancellation of scheduling conference	.10	25.00	
	TMV	Court notification re: cancellation of Scheduling Conference	.10	8.50	
05/05/2020	JJI	Review scheduling order	.10	25.00	
	JJI	Confer with Dunn re: order issues	.10	25.00	
	RRD	Receipt and review Court notification re: scheduling order	.10	25.00	
	RRD	Conference w/JJI re scheduling order issues	.10	25.00	
	TMV	Receipt and review of Court communication, login to Court website, review, organize and analyze e-filed Scheduling Order	.20	17.00	
	TMV	Email and Court Notification re: scheduling order and new deadlines (Discount: reduced by .10)	.10	8.50	
05/06/2020	TMV	Review Order executed by Judge, analyze and calculate target assignment and time limitations pursuant to Judge rules and requirements (20x)	2.00	170.00	

Statement No: 06/07/2020
10-3966

05/18/2020 JJI 3 emails re: discovery (Discount: reduced by .20) .10 25.00

TOTAL FOR CURRENT SERVICES RENDERED 3.30 429.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.30	\$250.00	\$75.00
Joshua J. Iacuone	0.50	250.00	125.00
Brian P. Shaw	0.10	250.00	25.00
Tina M. Vanderburg	2.40	85.00	204.00



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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

08/09/2020

Statement No: 11-4184

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
06/08/2020	JJI	Check file and response to client re: status	.20	50.00
	JJI	Confer with Dunn re: gameplan	.20	50.00
	RRD	Conference w/lacuone re status and strategy	.20	50.00
06/19/2020	BPS	7 emails with team and Scott re: deadline to add parties, analysis re: same (Discount: reduced by .40)	.30	75.00
	JJI	10 emails re: deadline add parties (Discount: reduced by .70)	.30	75.00
	MP	Six emails with Attorneys and Paralegal re upcoming deadline to add additional parties to suit and strategy re same (Discount: reduced by .60)		No/Chg
	TMV	7 emails with Client and team re: upcoming deadlines, analysis re: lawsuit and diversity issues (Discount: reduced by .40)	.30	25.50
06/22/2020	JJI	Call with client re: amend parties deadlines (5:22)	.10	25.00
	JJI	2 emails re: not amending parties (Discount: reduced by .10)	.10	25.00
06/25/2020	JJI	Email with paralegals re: trial setting	.10	25.00
	MP	Email with Atty lacuone and paralegal Vanderburg regarding trial schedule (Discount: reduced by .10)		No/Chg
	TMV	Email with Misty and Josh re: trial schedule status	.10	8.50

Crane/Lawsuit

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Statement No: 08/09/2020
11-4184

TOTAL FOR CURRENT SERVICES RENDERED	1.90	409.00
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.20	\$250.00	\$50.00
Joshua J. Iacuone	1.00	250.00	250.00
Misty Pounds	0.00	85.00	0.00
Brian P. Shaw	0.30	250.00	75.00
Tina M. Vanderburg	0.40	85.00	34.00

TOTAL CURRENT CHARGES	409.00
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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
 Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
 6404 Drawbridge Lane
 Plano, TX 75024

09/30/2020

Statement No: 12-4348

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
08/10/2020	BPS	Review order denying MTD	.10	25.00
	BPS	TC with JJI regarding strategy, etc	.30	75.00
	JJI	Call with Shaw re: Crane opinion (17:44 min)	.30	75.00
	JJI	Review MTD opinion denying same and analysis re: opinion and next steps	.20	50.00
	MP	6 emails with Attorneys and Paralegals re receipt of signed Memorandum Opinion and Order on Motion to Dismiss and coordination of tasks re same (Discount: reduced by .40)	.20	17.00
	RRD	1 email and court notification re: Denial of 12(b)(6) motion (Discount: reduced by .10)	.10	25.00
	TMV	Receipt and review of Court communication, login to Court website, review, organize and analyze e-filed Memorandum Opinion and Order on Rave's Mtn to Dismiss	.20	17.00
08/11/2020	JJI	Review file re: mediation and other items for strategy	.40	100.00
	JJI	Call with client re: next steps (15:25 min)	.30	75.00
	JJI	Confer with Dunn re: status and gameplan	.20	50.00
	MP	Receipt and review of conference call scheduled info with Counsel re case status and update calendar re same	.20	17.00
	MP	2 emails with Attorney re conference call scheduled and coordination of tasks re same (Discount: reduced by .10)	.10	8.50

Crane/Lawsuit

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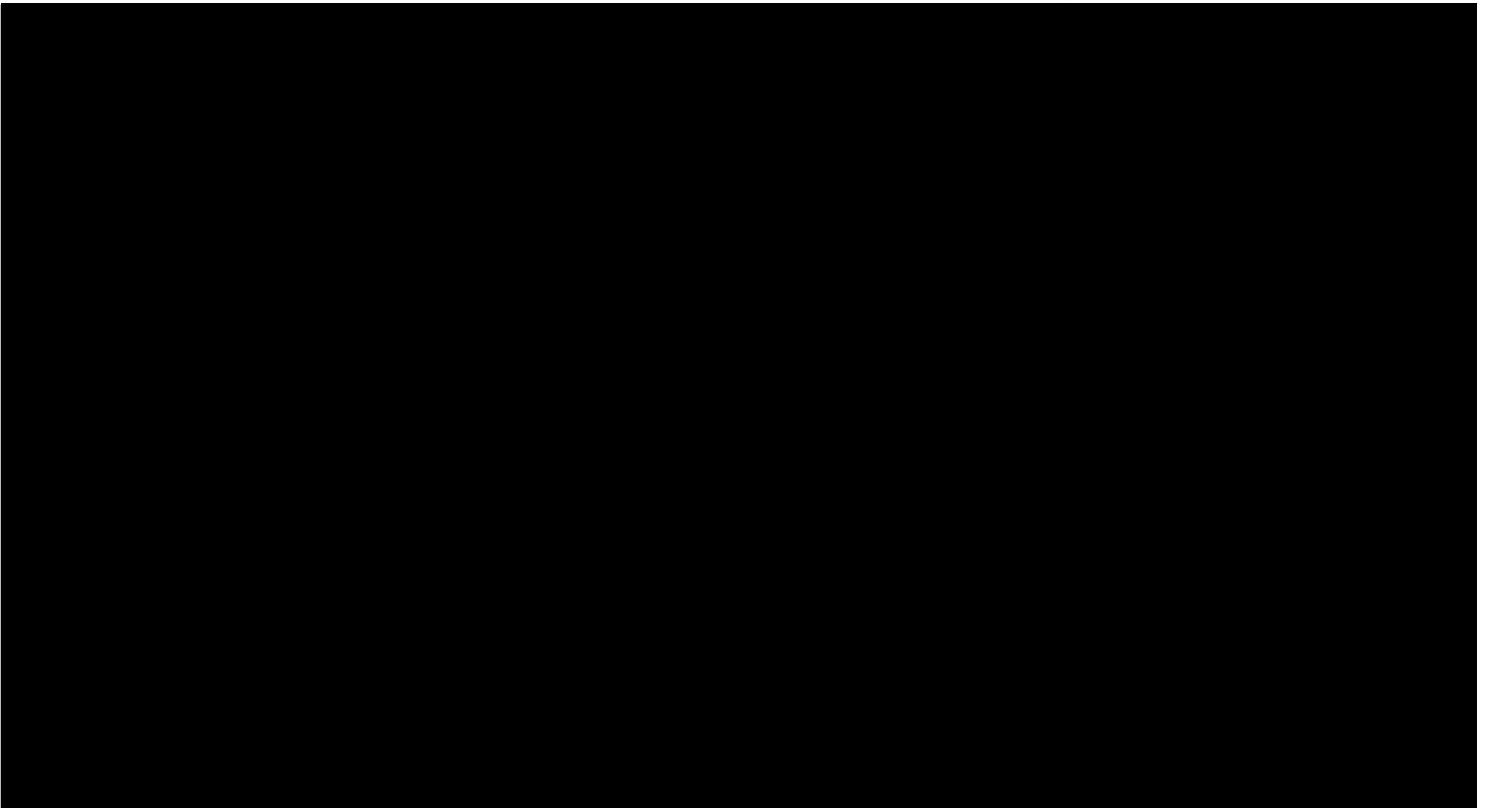
09/30/2020
12-4348

	MP	Receipt and review of signed Memorandum Opinion and Order on Motion to Dismiss filed by Court	.10	8.50
	RRD	Conference w/lacuone re update, quality control check, and discuss strategy	.20	50.00
	TMV	11 emails with team re: Opinion and Order and Mediation deadline (Discount: reduced by .80)	.30	25.50
08/13/2020	JJI	Call with Rave counsel re: mediation etc. and draft synopsis of same to client w/thoughts	.50	125.00
08/19/2020	JJI	7 emails re: mediation status (Discount: reduced by .50)	.20	50.00
08/24/2020	JJI	Review and notes on Rave answer and defenses	.30	75.00
	RRD	Court notification re: Defendant's Original Answer	.10	25.00
	TMV	Receipt and review of Court communication, login to Court website, review, organize and analyze e-filed Original Answer	.20	17.00
08/25/2020	JJI	9 emails re: status & mediation (Discount: reduced by .60)	.30	75.00
	JJI	Review mag consent notice	.10	25.00
	JJI	Review scheduling order and review deadlines/to-dos/strategy	1.20	300.00
	RRD	Review Court Notice re: US Magistrate Judge referral availability (Discount: reduced by .10)		No/Chg
	TMV	Court Notification/Docket Text re: Form Consent to Proceed Before Magistrate Judge	.10	8.50
08/26/2020	JJI	5 emails w/ [REDACTED] (Discount: reduced by .30)	.20	50.00
	RRD	Email from [REDACTED] Crane re: Pie Five Pizza Company and Rave	.10	25.00
08/27/2020	JJI	8 emails re: franchisee issues and deadlines (Discount: reduced by .50)	.30	75.00
	TMV	Email to Josh and Brian re: upcoming discovery deadline	.10	8.50
08/31/2020	BPS	Emails with JJI regarding deadlines; review scheduling order; review local rules; draft email to OC (Discount: reduced by .40)	.20	50.00
	JJI	6 emails re: experts and deadlines (Discount: reduced by .40)	.20	50.00
	RRD	Email with Salter, Josh and McElhaney re: supplemental document production (Discount: reduced by .10)		No/Chg
TOTAL FOR CURRENT SERVICES RENDERED			7.30	1,577.50

Statement No: 09/30/2020
12-4348

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.50	\$250.00	\$125.00
Joshua J. Iacune	4.70	250.00	1,175.00
Misty Pounds	0.60	85.00	51.00
Brian P. Shaw	0.60	250.00	150.00
Tina M. Vanderburg	0.90	85.00	76.50

TOTAL CURRENT CHARGES**1,577.50**



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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

12/07/2020

Statement No: 13-4638

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
09/01/2020	BPS	Emails with JJI regarding expert disclosure; review local rules; draft expert disclosure; emails with JJI and client; emails with client and team; finalize and serve same (Discount: reduced by .30)	1.10	275.00
	JJI	Draft update of call w/Rave counsel and agenda for team meeting for discovery and pretrial issues	.30	75.00
	JJI	Review disclosure draft for experts, and review/revise same	.20	50.00
	JJI	Briefly review supplemental Rave docs and instructions on saving and forwarding to client (Discount: reduced by .10)	.20	50.00
	JJI	Prepare TDL for trial and final push and circulate to team	.30	75.00
	JJI	22 emails re: deadlines, discovery and call with Rave counsel (Discount: reduced by 1.50)	.70	175.00
	JJI	Review file and prepare for Crane call	.20	50.00
	JJI	Call with Rave counsel	.20	50.00
	MP	Receipt, review and download of supplemental document production received from Defendants bates labeled RAVE 000052-000493 and organize and save to file (Discount: reduced by .20)	.30	25.50
	MP	4 emails with Attorneys and Paralegals re receipt of supplemental document production received from OC and coordination of tasks to download and view same (Discount: reduced by .30)	.10	8.50
	MP	Analyze all docs produced by Def bates labeled RAVE 00052-000493 to make sure they were not for "Attorney's Eyes Only"	.10	8.50
	MP	Create dropbox folder, upload and organize docs produced by Def	.20	17.00

Crane/Lawsuit

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Statement No.:

12/07/2020
13-4638

		RAVE 000052-000493 and generate link to be sent to Client for review		
	MP	Receipt and review of email to Client forwarding dropbox link containing docs produced by Def RAVE 000052-000493 for review and scheduling telephone conference to discuss same (Discount: reduced by .10)		No/Chg
	MP	5 emails with team re: review of docs produced (Discount: reduced by .40)	.10	8.50
	MP	Careful review of documents produced to ensure no AEO and upload documents to DropBox for client review	.40	34.00
	RLT	Attention to 15 e-mails with attorney lacuone and Shaw regarding supplemental document production and various assignments (Discount: reduced by 1.00)	.50	42.50
	TMV	5 emails with Josh, Shaw and para re: document production review (Discount: reduced by .30)	.20	17.00
09/02/2020	BPS	TC with client and JJI regarding strategy; emails with team regarding discovery issues (Discount: reduced by .20)	.90	225.00
	JJI	Call with team about issues and next steps forward (1:04:33 min)	1.10	275.00
	JJI	Draft detailed immediate action items for team	.30	75.00
	JJI	Review notes, dates, deadlines, etc. and draft letter to o/c re: depos., mediation, and next steps etc.	.40	100.00
	JJI	Review various new docs, SSs etc. from client	.20	50.00
	JJI	31 emails re: docs, strategy etc. (Discount: reduced by 2.20)	.90	225.00
	RLT	Prepare letter to Court identifying J. Shipp as the parties' choice to mediate	.30	25.50
	RLT	Prepare deposition notice for M. Schwarz	.30	25.50
	RLT	Prepare deposition notice for Rave corporate rep	.30	25.50
	RLT	Update calendar with depositions of M. Schwarz and Rave Corporate Rep	.10	8.50
	RLT	Attention to seven (7) e-mails with attorney lacuone and Client regarding mediation and document production (Discount: reduced by .50)	.20	17.00
	TMV	21 emails with Josh, Shaw, opp counsel re: preparation of discovery requests, client's forecast performance LTIP plan, letter to opp counsel re: depos and mediation (Discount: reduced by 1.40)	.70	59.50
	TMV	Begin draft of first set of Written discovery	.40	34.00
	TMV	Review, finalize, format, convert and e-serve letter to opposing counsel re: depos and mediation (Discount: reduced by .20)		No/Chg
09/03/2020	BPS	Review and revise first set of written discovery (including RFP, RFA, and Roggs); TC with JJI regarding discovery strategy (Discount: reduced by .40)	2.80	700.00
	BPS	Confer with Attorney Dunn regarding discovery	.20	50.00
	JJI	Call with Crane re: status & review of docs (10:15-10:29)	.20	50.00
	JJI	13 emails re: status and call for witnesses (Discount: reduced by .80)	.50	125.00
	JJI	Draft 25+ categories of corp. rep. categories for NOD & send to o/c	1.50	375.00
	RRD	Conference w/Shaw re discovery strategy	.20	50.00
	TMV	8 emails with Client, Josh, Shaw and opp counsel re: depo of corp rep,	.20	17.00

Statement No:

12/07/2020
13-4638

corp rep categories/topics, (Discount: reduced by .60)

09/04/2020	BPS	Continue drafting discovery requests (RFP, RFA, and Roggs); emails with client; emails with JJI; final review of same; email to JJI re same (Discount: reduced by .20)	1.20	300.00
	JJI	Revise and add to significantly 1st set of written discovery requests & serve	3.50	875.00
	JJI	16 emails w/client and Shaw re: discovery etc. (Discount: reduced by 1.00)	.60	150.00
	RLT	Attention to six (6) e-mails with team and Client regarding document production and re-distribution of tasks (Discount: reduced by .50)	.10	8.50
	TMV	6 emails with Client, Shaw lacuone and opp counsel re: discovery requests (Discount: reduced by .40)	.20	17.00
09/05/2020	RLT	Receipt and review of discovery requests, distribute same and save same to the system	.20	17.00
	RLT	Calendar deadline to respond to discovery requests	.10	8.50
	RLT	Set up reminders for discovery deadlines and "tickler" email reminders	.20	17.00
	RLT	Prepare documents and send to word processing for draft responses to be prepared (Discount: reduced by .10)		No/Chg
09/09/2020	JJI	Call with Scott re: deposition dates (9:11 min)	.20	50.00
	JJI	3 emails re: depos, strategy etc. (Discount: reduced by .20)	.10	25.00
09/10/2020	JJI	3 emails re: Depos and Meetings (Discount: reduced by .20)	.10	25.00
	JJI	Call with Crane re: status, witnesses etc. and notes re: same	.20	50.00
09/11/2020	JJI	Review discovery from Rave to Crane, and directive to circulate w/deadlines	.40	100.00
	JJI	4 emails re: discovery (Discount: reduced by .20)	.20	50.00
	TMV	4 emails with Scott, Josh and Shaw re: discovery requests (Discount: reduced by .20)	.20	17.00
	TMV	Calculate and calendar response date for discovery requests and "tickler" email reminders	.20	17.00
09/15/2020	BPS	Emails with JJI regarding amendment deadline; review order; review complaint	.20	50.00
	JJI	Review current complaint and analyze whether [REDACTED]	.20	50.00
	JJI	Review info. re: available dates for subpoenas/depositions of 3rd party witnesses, coordinate etc.	.30	75.00
	JJI	Discussion and analyses re: amending [REDACTED]	.40	100.00
09/16/2020	BPS	Strategise with JJI regarding trial strategy	.20	50.00
	JJI	Call w/Shaw re: strategy	.20	50.00

Crane/Lawsuit

Confidential

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	JJI	Call with Scott re: dates etc.	.20	50.00
	JJI	11 emails re: dates, depositions etc. (Discount: reduced by .70)	.40	100.00
09/17/2020	JJI	11 emails re: dates & confirmations for 3rd Party subpoenas (Discount: reduced by .70)	.40	100.00
	JJI	Work on subpoena and directives re: subpoena for Bafundo	.50	125.00
	RLT	Attention to nine (9) e-mails with team regarding discovery, subpoenas and deadlines (Discount: reduced by .60)	.30	25.50
	TMV	12 emails with Josh and Brian re: setting up depo of Bafundo (Discount: reduced by .80)	.40	34.00
09/18/2020	BPS	Emails with paralegal regarding Bafundo depo; review and revise subpoena and depo notice; emails with paralegal regarding same (Discount: reduced by .20)	.30	75.00
	JJI	27 emails re: subpoenas and scheduling (Discount: reduced by 1.60)	1.10	275.00
	JJI	Review subpoena and NOD and directives re: same	.20	50.00
	RLT	Attention to two (2) e-mails with team regarding strategy and status (Discount: reduced by .10)	.10	8.50
	TMV	Work on scheduling Bafundo deposition, communications with Court Reporter re: Zoom remote depo, prepare Subpoena and Notice of Depo and 26 emails with Shaw, Iacune, court reporter, Bob Bafundo, opposing counsel regarding same (Discount: reduced by 1.70)	.90	76.50
09/20/2020	RLT	Attention to one (1) e-mail with team regarding deposition confirmation (Discount: reduced by .10)		No/Chg
	TMV	2 emails with Bob Bafundo and attys confirming receipt of Notice and Subpoena for deposition (Discount: reduced by .10)	.10	8.50
09/21/2020	JJI	11 emails re: Bafundo subpoena and directives re: same (Discount: reduced by .70)	.40	100.00
	JJI	Review and issues on depositions/subpoenas	.40	100.00
	TMV	14 emails with Josh, Shaw, Court Reporter re: witness fee and proof of service of subpoena and whether we want Rush or Standard transcript for Bafundo (Discount: reduced by .90)	.50	42.50
09/22/2020	JJI	27 detailed emails (Discount: reduced by 1.80)	.90	225.00
	JJI	Check calendars etc., and directives with client & opposing counsel re: all depositions/subpoenas/strategy/order/remaining issues	.60	150.00
	TMV	15 emails with team, Scott re: scheduling depo prep with witnesses (Discount: reduced by 1.00)	.50	42.50
09/23/2020	JJI	24 emails re: depositions/subpoenas (Discount: reduced by 1.60)	.80	200.00
	JJI	Directives re: depositions/subpoenas & dates & reach out to some deponents re: availability	.30	75.00
	RLT	Attention to one (1) e-mail with team regarding updated docket sheet (Discount: reduced by .10)		No/Chg

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	RRD	Email with paralegal and team re: updated docket sheet (Discount: reduced by .10)		No/Chg
	TMV	17 emails with team, Scott, Court Reporter re: scheduling remote deposition of Andrea Allen, preparation of Subpoena and Notice and update of docket sheet (Discount: reduced by .90)	.80	68.00
	TMV	Update and distribute docket sheet	.20	17.00
	TMV	Draft Notice of Deposition and Subpoena and communicate with Court Reporter to obtain remote video credentials for deposition	.20	17.00
	TMV	Update calendar (2x) and "tickler email reminders	.40	34.00
09/24/2020	BPS	Emails with paralegal and JJI regarding various discovery matters; emails from OC regarding mediators (Discount: reduced by .70)	.30	75.00
	JJI	Review shells for discovery responses & issues re: sending various subpoenas & dates/service etc., approving/service Andrea subpoena	.70	175.00
	JJI	11 emails re: depositions, mediation (Discount: reduced by .70)	.40	100.00
	RLT	Attention to six (6) e-mails with team regarding deposition notices and subpoenas (Discount: reduced by .40)	.20	17.00
	TMV	9 emails with Josh, Shaw, opp counsel, Andrea Allen, Court Reporter re: scheduling depo of Andrea Allen and responding to discovery requests (Discount: reduced by .60)	.30	25.50
	TMV	Begin preparation of discovery responses	.20	17.00
	TMV	Review, finalize, format, convert and e-serve Subpoena and Notice of Deposition of Andrea Allen	.30	25.50
09/25/2020	JJI	9 emails re: deposition, further mediation discussion (Discount: reduced by .60)	.30	75.00
	RLT	Attention to one (1) e-mail with attorneys lacuone, Shaw, Client and paralegal Vanderburg regarding outstanding discovery (Discount: reduced by .10)		No/Chg
	TMV	3 emails with Andrea Allen, Shaw, lacuone and Scott re: discovery and Allen's confirmation of receipt of Subpoena and depo notice (Discount: reduced by .20)	.10	8.50
09/28/2020	BPS	Emails with JJI and OC regarding depositions; TC with JJI regarding same (Discount: reduced by .80)	.40	100.00
	CMJ	Prepare Joint Notice of Mediator	.20	17.00
	CMJ	Revise Plaintiff's Objections and Answers to Defendant's First Interrogatories (.5)	.30	25.50
	JJI	12 emails re: depositions/discovery responses (Discount: reduced by .80)	.40	100.00
	JJI	Call w/Dunn re: strategy	.20	50.00
	JJI	Review file and lengthy email to o/c re: Schwarz as corp. rep. and individual	.30	75.00
	RLT	Attention to two (2) e-mails with team and Client regarding reminder regarding discovery (Discount: reduced by .10)	.10	8.50
	RRD	TC w/lacuone re gameplan	.20	50.00
	TMV	3 emails with Scott, Josh and Shaw re: discovery responses (Discount: reduced by .20)	.10	8.50

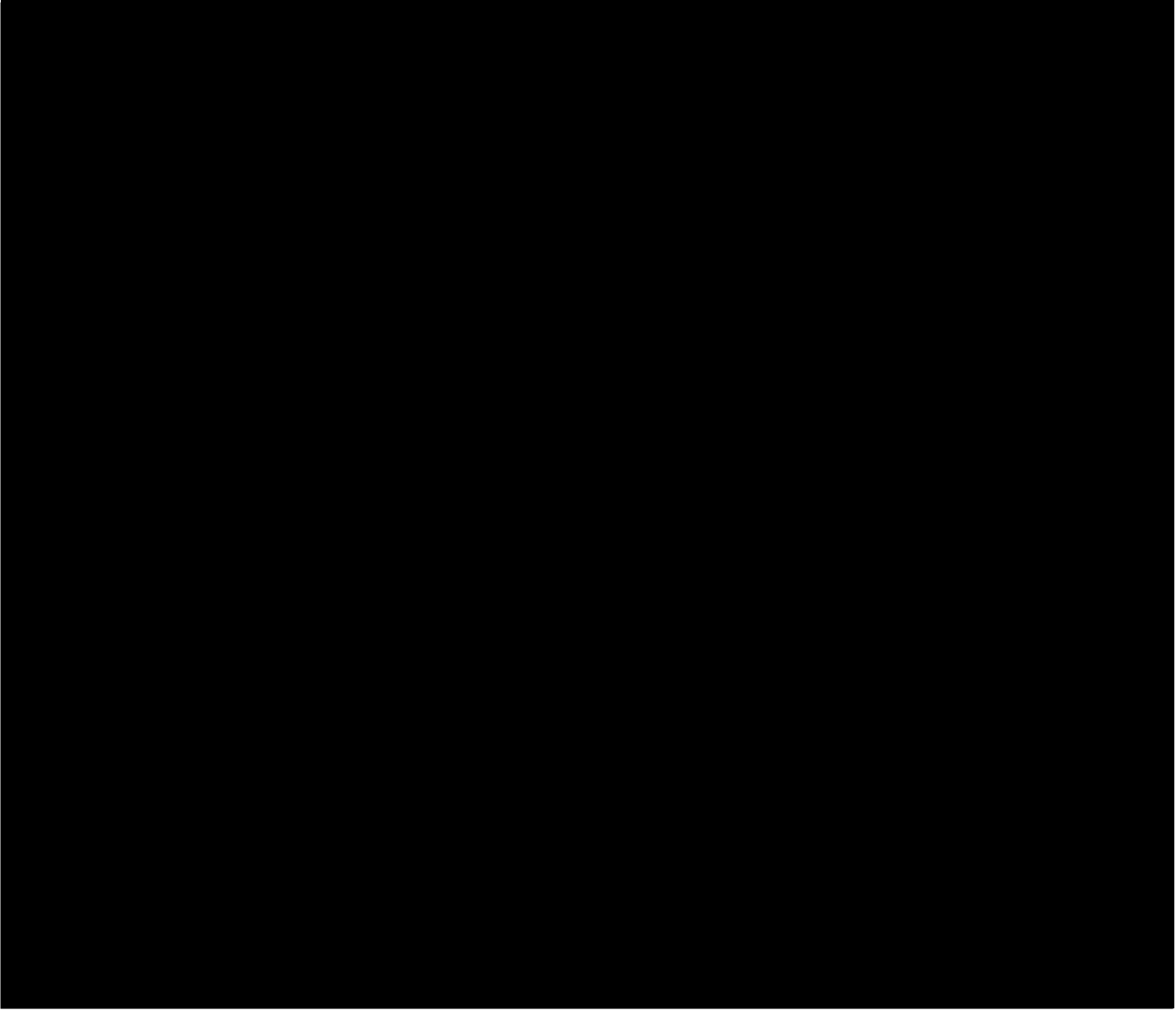
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09/29/2020	BPS	Emails with OC regarding various litigation matters	.30	75.00
	JJI	13 emails re: depos/mediator etc. (Discount: reduced by .90)	.40	100.00
	JJI	Prepare for [REDACTED] call	.80	200.00
	JJI	Research new Sellers cites; further support for legal analyses	.60	150.00
	JJI	Long call re: subpoena	1.40	350.00
	JJI	Review Suppl. Disclosures from Rave & issues re: depos of newly identified witnesses	.40	100.00
	JJI	Confer with Dunn re: gameplan, witness, and research	.30	75.00
	RRD	5 emails with Josh and opp counsel re: amended disclosures and scheduling depositions (Discount: reduced by .30)	.20	50.00
	RRD	Conference w/lacuone re his research and new witnesses and strategy going forward	.30	75.00
	TMV	3 emails with Client, Josh and Brian re: scheduled telephone conference (Discount: reduced by .20)	.10	8.50
09/30/2020	BPS	Review expert disclosure; emails with OC regarding mediation and depos (Discount: reduced by .20)		No/Chg
	JJI	18 emails re: mediator; depos; etc (Discount: reduced by 1.20)	.60	150.00
	JJI	Revise and approve letter re: agreed mediator	.10	25.00
	JJI	Review expert and suppl. Disclosures	.30	75.00
	JJI	Reach out to mediator re: dates/times and provide info. on case etc	.20	50.00
	JJI	Update outline for Bafundo depo. & prepare for same	1.60	400.00
	JJI	Confer with Dunn re depo for Bafundo	.20	50.00
	RLT	Attention to seven (7) e-mails regarding depositions, mediation and discovery (Discount: reduced by .40)	.30	25.50
	RRD	Email with opp counsel and lacuone re: dates for depositions (Discount: reduced by .10)		No/Chg
	RRD	Conference w/lacuone re Bafundo depo	.20	50.00
	TMV	13 emails with Josh, Shaw, Court Reporter, mediator re: confirmation of mediation, preparation of notice of deposition, scheduling mediation and confirmation of mediator (Discount: reduced by 1.00)	.30	25.50
TOTAL FOR CURRENT SERVICES RENDERED			50.50	10,562.50

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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	1.10	\$250.00	\$275.00
Joshua J. Iacuone	29.00	250.00	7,250.00
Celeste Jones	0.50	85.00	42.50
Misty Pounds	1.20	85.00	102.00
Brian P. Shaw	7.90	250.00	1,975.00
Rhonda L Thomas	3.30	85.00	280.50
Tina M. Vanderburg	7.50	85.00	637.50





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

12/08/2020

Statement No: 14-4640

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
10/01/2020	BPS	Review emails from 9/29 and today regarding various issues; email client regarding same	.30	75.00
	JJI	Prepare for and attend Bafundo depo. (6 a.m. - 9:05)	3.10	775.00
	JJI	Review Complaint after witness discussions & questions re: same	.40	100.00
	JJI	57 emails re: depositions, mediation, Complaint etc. (Discount: reduced by 3.60)	2.10	525.00
	JJI	Call w/client re: depositions (9:10 - 9:24)	.20	50.00
	JJI	Review available dates for mediator and Rave group, confer w/client and confirm w/mediator office	.30	75.00
	JJI	Find and pull exhibits for Andrea deposition	1.10	275.00
	JJI	Review docs for depo. & work on production & circulate to team re: same	.30	75.00
	JJI	Call [REDACTED] (16:45)	.30	75.00
	RLT	Attention to five (5) e-mails with Team regarding mediation, exhibits, discovery and deposition preparation (Discount: reduced by .30)	.20	17.00
	TMV	20 emails with mediator's office, Client, Josh, Shaw and Court Reporter re: scheduling mediation, admission of exhibits during remote deposition, preparation of deposition, scheduling depo prep conference with Allen (Discount: reduced by 1.40)	.60	51.00
	TMV	Update calendar (3x) and "tickler" email reminders	.20	17.00

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10/02/2020	JJI	22 emails re: production, mediation, Zoom etc. (Discount: reduced by 1.50)	.70	175.00
	JJI	Review and approve for filing Mediator selection to Court	.10	25.00
	JJI	Two calls with McElhaney re: depositions and dates	.20	50.00
	JJI	Finalize and produce email and spreadsheets related to Andrea for depo., bates & serve	1.80	450.00
	JJI	Confer with Dunn re: Bafundo depo	.40	100.00
	RLT	Attention to eight (8) e-mails with team regarding production and discovery process (Discount: reduced by .50)	.30	25.50
	RRD	Conference w/lacuone re Bafundo depo and obtain downloaded	.40	100.00
	TMV	11 emails with Court Reporter, Client, Mediator, lacuone and Shaw re: confirmation of deposition of Allen, upcoming mediation and transmittal of scheduling order to mediator (Discount: reduced by .70)	.40	34.00
	TMV	Email and court notification re: document production and Parties' Agreement to a Mediator (Discount: reduced by .10)	.10	8.50
10/04/2020	JJI	4 emails with opp counsel, Dunn, and Shaw re: depo dates and notice (Discount: reduced by .30)	.10	25.00
	RRD	4 emails with lacuone, Shaw and opp counsel re: notice of depo, dates for depositions (Discount: reduced by .30)	.10	25.00
10/05/2020	BPS	TC with JJI regarding strategy; TC with Andrea Allen; TC with JJI regarding strategy; review docs in preparation for Allen depo; TCs with JJI regarding same; prepare for depo; conduct depo; TC with JJI; emails with OC	8.40	2,100.00
	CMJ	Revise Plaintiff's Objections and Responses to Defendant's First Set of Requests for Production (.30)	.60	51.00
	CMJ	Prepare Joint Notice of Mediator.	.10	8.50
	CMJ	Finalize and file Joint Notice of Mediator with Court.	.10	8.50
	CMJ	Three emails with opposing counsel and RDG Team regarding agreed notice of mediator. (Discount: reduced by .20)	.10	8.50
	JJI	Calls w/Shaw & call w/Andrea	.30	75.00
	JJI	33 emails w/spreadsheets and Exhibits and 15 texts (Discount: reduced by 1.90)	1.40	350.00
	JJI	Review notice from Court and instructions on pleading re: mediation (Discount: reduced by .10)		No/Chg
	JJI	Review file and triple-confirm due date responses back to Rave	.20	50.00
	JJI	Attend depo. of Andrea (1:30 - 5:30)	4.00	1,000.00
	JJI	Review Rave discovery responses	.40	100.00
	JJI	Follow-up call with Shaw re: depo. (23:33)	.40	100.00
	RLT	Attention to 13 e-mails with team regarding deposition, discovery, status and strategy (Discount: reduced by 1.10)	.20	17.00
	RRD	4 emails with paralegal, opp counsel, Shaw and lacuone re: Joint Notice of Mediator, document production (Discount: reduced by .30)	.10	25.00
10/06/2020	BPS	Emails with OC regarding discovery responses and other matters; TC with JJI and client regarding various litigation issues (Discount:	1.20	300.00

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		reduced by .40)		
	BPS	Confer with Dunn regarding gameplan and Amended deposition	.30	75.00
	CMJ	Communications with Shipp Mediation regarding confirming scheduled mediation (Discount: reduced by .10)		No/Chg
	JJI	18 emails re: protective order & when docs produced & subpoenas/depos (Discount: reduced by 1.20)	.60	150.00
	JJI	Call with Crane and Brian re: depos, strategy etc (1:04:33)	1.10	275.00
	JJI	Call w/McElhaney re: depos and various scheduling	.20	50.00
	JJI	Review confirmation materials from mediator and forward to client	.20	50.00
	JJI	Review calendars and determine scheduling	.20	50.00
	RLT	Attention to one (1) e-mail with Client regarding corporate deposition (Discount: reduced by .10)		No/Chg
	RRD	5 emails with Client, JJI, BPS, para and opp counsel re: proposed protective order, scheduling time to confer on Rave's objections, Def's discovery responses (Discount: reduced by .40)	.10	25.00
	RRD	Conference w/Shaw re Amended depo and future strategy	.30	75.00
10/07/2020	BPS	Emails with JJI and client regarding case strategy and other issues (Discount: reduced by .40)	.20	50.00
	CMJ	Download and review Defendant's document production RAVE 000494-001079	.70	59.50
	CMJ	Finalize and send letter, attachments and Agreement to Mediate to client (Discount: reduced by .30)	.10	8.50
	CMJ	Receive and review two e-mail notifications from the Court regarding Court order on Referring Case to Mediation. (Discount: reduced by .20)		No/Chg
	JJI	19 emails re: depos, docs, strategy etc. (Discount: reduced by 1.40)	.50	125.00
	JJI	Call w/client re: [REDACTED]	.10	25.00
	JJI	Review doc production from Rave and forward	.30	75.00
	JJI	Review court order on mediation	.10	25.00
	JJI	Draft in depth action item plan after conversations/docs/etc.	.30	75.00
	JJI	Revise and forward mediation letter to client	.20	50.00
	RLT	Attention to six (6) e-mails with team regarding discovery responses (Discount: reduced by .40)	.20	17.00
	RRD	Email with Salter, Shaw and lacuone re: Rave document production	.10	25.00
10/08/2020	BPS	TC with JJI regarding strategy issues; draft discovery responses; review and analyze requests for same; email to client regarding same; extended TC with client regarding discovery responses	.90	225.00
	CMJ	Four emails with attorneys regarding discovery responses and document production	.40	34.00
	JJI	Multiple calls re: scheduling, depos., mediation etc.	.40	100.00
	JJI	Review draft discovery responses	.30	75.00
	JJI	5 emails re: status (Discount: reduced by .30)	.20	50.00

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10/09/2020	BPS	Emails with client and JJI; draft letter to OC regarding incomplete discovery responses (Discount: reduced by .60)	.70	175.00
	JJI	9 emails re: discovery, depositions etc. (Discount: reduced by .60)	.30	75.00
10/10/2020	BPS	Continue drafting letter to OC regarding production; review local rules for same; email to client and OC regarding same	.50	125.00
	JJI	8 emails re: discovery, letter on deficiencies etc. (Discount: reduced by .60)	.20	50.00
	JJI	Call w/Shaw re: strategy on letter and discovery	.10	25.00
	JJI	Revise and serve letter on deficiencies and depositions	.30	75.00
10/11/2020	JJI	Email with Team re: discovery (Discount: reduced by .10)		No/Chg
	RLT	Attention to one (1) e-mail with team regarding discovery (Discount: reduced by .10)		No/Chg
10/12/2020	BPS	Continue drafting responses to roggs and RFP; emails to client and JJI regarding same; TC with Crane; continue work on production and roggs; email client regarding same; TC with JJI regarding strategy; TC with client; review discovery responses; TC with client; finalize discovery and send to OC via email (Discount: reduced by .40)	2.70	675.00
	JJI	Review, revise, and finalize discovery responses & review final/served	.30	75.00
	JJI	19 emails re: discovery, status etc. (Discount: reduced by 1.20)	.70	175.00
	JJI	Draft email to o/c re: filing of motion unless hear on discovery deadline, etc; emails and calls re: same	.30	75.00
	JJI	Ensure calendaring of various new deadlines	.10	25.00
10/13/2020	BPS	TC with RRD regarding strategy; TC with OC regarding scheduling issues; receive and review extensive letter from OC; analyze same; email to client regarding same	.60	150.00
	CMJ	Receive and review e-mail notifications from the Court regarding Agreed Motion for Extension of Time Court filings. (Discount: reduced by .10)		No/Chg
	JJI	15 emails re: discovery, deadlines etc. (Discount: reduced by 1.00)	.50	125.00
	JJI	Follow up calls re: depositions, extensions etc.	.30	75.00
	JJI	Call w/McElhaney re: extensions etc. (14:23)	.20	50.00
	JJI	Review McElhaney letter on docs & discovery responses; and long email responding to same & depositions & agreements etc.	.40	100.00
	RRD	Court notifications re: Agreed Motion for Extension (Discount: reduced by .10)		No/Chg
	RRD	Conference w/Shaw re strategy	.20	50.00
10/14/2020	BPS	Emails with client; TC with client regarding same; draft letter to OC regarding same; review and revise same; email to JJI regarding same (Discount: reduced by .50)	2.40	600.00
	CMJ	Receive and review two e-mail notifications from the Court regarding Court order on Agreed Motion for Extension of Time.	.20	17.00
	JJI	Review Order granting extension for MSJ deadline	.10	25.00

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	JJI	7 emails re: discovery, depositions etc. (Discount: reduced by .40)	.30	75.00
	JJI	Confer with Dunn re: depositions in future	.20	50.00
	RRD	Court notification re: Order Granting Agreed Motion for Extension of Time to file dispositive motions (Discount: reduced by .10)		No/Chg
	RRD	Conferene w/lacuone re future depositions	.20	50.00
10/15/2020	JJI	7 emails re: discovery, depositions etc. (Discount: reduced by .40)	.30	75.00
10/16/2020	BPS	Review text message production in advance of producing to OC; short conference with JJI regarding production and other strategy; arrange for production; email to client with letter to OC regarding discovery	.60	150.00
	CMJ	Three emails with RDG Team regarding discovery production and work to be done. (Discount: reduced by .20)	.10	8.50
	CMJ	Revise, finalize and serve Plaintiff's additional document production CRANE 0000107-0000114	.20	17.00
	CMJ	Receipt and review of Bob Bafundo's deposition transcript and exhibits, save same to file.	.20	17.00
	CMJ	Receipt and review of Andrea Allen's deposition transcript and exhibits, save same to file	.30	25.50
	JJI	19 emails re: docs, depositions, etc. (Discount: reduced by 1.50)	.40	100.00
	JJI	Review Bafundo depo. transcript and forward to team	.30	75.00
	JJI	Review discovery conference Reply letter to Scott Mc.	.30	75.00
	TMV	5 emails with Court reporters, Court and team re: Bafundo transcript and Order Granting Agreement Motion for Extension of Time to file Dispositive Motions (Discount: reduced by .30)	.20	17.00
10/20/2020	CMJ	Receipt and review of Andrea Allen's deposition transcript and exhibits, save same to file	.20	17.00
	JJI	4 emails re: dates for rescheduling depositions etc. (Discount: reduced by .30)	.10	25.00
10/21/2020	BPS	Emails with client and JJI; TC with OC; TC with JJI; review and analyze various production; email to JJI and client regarding same; email to client regarding various production issues (Discount: reduced by .70)	1.10	275.00
	JJI	13 emails re: docs, depositions etc. (Discount: reduced by .90)	.40	100.00
	JJI	Calls and review various docs re: comp plan issues etc.	.50	125.00
	JJI	Confer with Dunn re game and comp plan	.20	50.00
	RRD	Conference w/lacuone re comp plan issues and strategy	.20	50.00
10/22/2020	JJI	8 emails re: meeting w/client and depo./discovery issues (Discount: reduced by .50)	.30	75.00
10/23/2020	BPS	TC conference with client and JJI regarding case strategy; review and revise email from JJI	1.10	275.00
	JJI	Review various letters re: discovery and supplemental production and analyze	.50	125.00

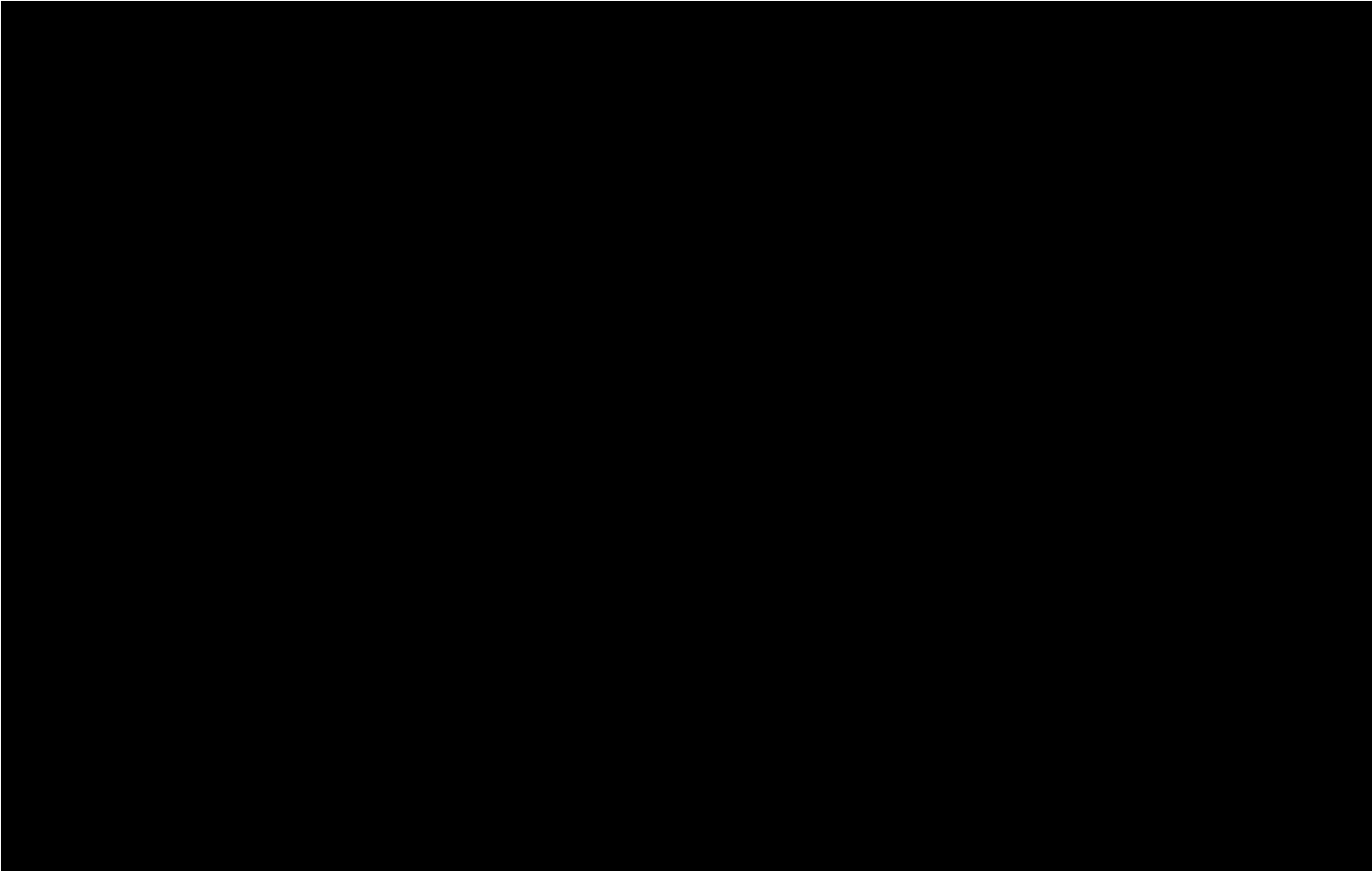
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	JJI	Draft email to team to send to Rave counsel re: depositions & docs required before same	.20	50.00
	JJI	Call with team re: status/strategy (9:30-10:32) (Discount: reduced by .30)	.70	175.00
	JJI	17 emails re: depositions, discovery etc. (Discount: reduced by 1.10)	.60	150.00
	RRD	Email with o/c, Josh and Shaw re: document production	.10	25.00
10/25/2020	JJI	6 emails re: McElhaney letter and if changes deposition letter (Discount: reduced by .40)	.20	50.00
10/26/2020	BPS	Emails with client and JJI regarding various matters; emails with OC; review letter from OC regarding production; call with client and JJI; emails with JJI and client; work on email to OC (Discount: reduced by .30)	1.50	375.00
	CMJ	Schedule zoom conference call with client and attorneys (Discount: reduced by .20)		No/Chg
	JJI	Call w/team re: discovery and deposition issues (3-4:01)	1.00	250.00
	JJI	33 emails with team and o/c re: depositions and docs (Discount: reduced by 2.60)	.70	175.00
10/27/2020	BPS	Strategize with JJI regarding expert issue, etc; emails with JJI and client; review disclosures and initial production regarding new defense of Rave; telephone call with OC and JJI; conference with JJI	1.20	300.00
	JJI	Call w/opposing counsel re: extensions and deposition. (25:11)	.40	100.00
	JJI	15 emails re: docs, depositions etc. (Discount: reduced by 1.00)	.50	125.00
	JJI	Meeting w/Shaw re: strategy & McElhaney call	.20	50.00
	JJI	Revise, circulate, and serve letter on o/c after teleconference	.40	100.00
10/28/2020	BPS	Emails with JJI regarding letter to OC (Discount: reduced by .20)		No/Chg
	JJI	Finalize and serve letter re: experts and deadlines and depositions (Discount: reduced by .10)	.20	50.00
10/30/2020	JJI	4 emails re: expert issues, discovery and letters (Discount: reduced by .20)	.20	50.00
	JJI	Brief call with opposing counsel re: status	.10	25.00
TOTAL FOR CURRENT SERVICES RENDERED			66.70	15,734.50

Statement No: 12/08/2020
14-4640

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	1.80	\$250.00	\$450.00
Joshua J. Iacuone	35.50	250.00	8,875.00
Celeste Jones	3.30	85.00	280.50
Brian P. Shaw	23.70	250.00	5,925.00
Rhonda L Thomas	0.90	85.00	76.50
Tina M. Vanderburg	1.50	85.00	127.50





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

12/09/2020

Statement No: 15-4647

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
11/02/2020	BPS	Emails with JJI and OC regarding various matters (Discount: reduced by .10)	.10	25.00
	JJI	4 emails re: follow-up on depositions & expert issues w/opposing counsel (Discount: reduced by .30)	.10	25.00
11/03/2020	BPS	Emails with OC and JJI regarding various matters (Discount: reduced by .10)	.10	25.00
	JJI	3 emails re: deadlines etc. (Discount: reduced by .20)	.10	25.00
	RRD	Review Shaw's two EMs (Discount: reduced by .20)		No/Chg
11/04/2020	BPS	Emails with OC and JJI regarding expert designation issues; emails to OC; research issues on expert designation; begin drafting motion to designate expert (Discount: reduced by .50)	1.70	425.00
	JJI	16 emails re: status w/opposing counsel (Discount: reduced by 1.10)	.50	125.00
11/05/2020	BPS	Emails with JJI regarding expert issues; emails to contacts regarding potential expert; TC with client and JJI; continue drafting motion to designate expert; TCs with JJI; TC with potential expert (Discount: reduced by .60)	2.60	650.00
	JJI	15 emails re: motion/mediation etc. & inquiring as to expert (Discount: reduced by 1.00)	.50	125.00

			Statement No:	12/09/2020 15-4647
	JJI	Call with team re: expert issues (22:33)	.40	100.00
	JJI	Review various expert issues/continuance motion/options	.50	125.00
	JJI	Confer with Dunn re: expert	.20	50.00
	RRD	Conference w/lacuone re expert issues	.20	50.00
11/06/2020	BPS	Continue drafting motion for continuance/designate experts; research same; TC to potential expert; TC w JJI; continue working on continuance	.90	225.00
	JJI	4 emails re: experts etc. (Discount: reduced by .20)	.20	50.00
11/07/2020	JJI	Review mediation materials and forward to client (Discount: reduced by .10)		No/Chg
	TMV	Email from Mediator's office re: upcoming mediation (Discount: reduced by .10)		No/Chg
11/09/2020	BPS	Continue drafting motion for continuance; continue researching; TC with client; emails with same; emails with JJI regarding strategy (Discount: reduced by 2.20)	5.10	1,275.00
	JJI	21 emails re: continuance, mediation etc. (Discount: reduced by 1.50)	.60	150.00
	JJI	Review McElhaney response letter on discovery and experts	.20	50.00
	JJI	Review letter and latest doc dump and forward to client (Discount: reduced by .10)		No/Chg
	RRD	Email from opp counsel re: McElhaney letter and Sharefile link	.10	25.00
11/10/2020	BPS	Begin drafting mediation position statement; TC with JJI regarding strategy; review and revise motion for continuance; draft exhibit to motion	3.90	975.00
	JJI	Calls with Shaw & McElhaney re: continuance, experts etc.	.30	75.00
	JJI	Call with client re: status etc. (12:03)	.20	50.00
	JJI	Review and revise motion for new scheduling order/continuance	.50	125.00
11/11/2020	BPS	Continue drafting mediation position statement; emails with JJI; TC with OC; draft response to Shipp's mediation intake form; emails with JJI regarding strategy; draft JJI declaration; TC with JJI; finalize motion and supporting docs and file same via ECF; 25+ emails; revise mediation position statement based on JJI's input; email to client regarding same (Discount: reduced by 1.50)	4.20	1,050.00
	CMJ	Proofread and revise Crane's Motion for Leave to Amend Scheduling Order and Continue Trial Setting	.30	25.50
	JJI	26 emails and calls/voicemails re: mediation, trial, and Crane depo. (Discount: reduced by 1.80)	.80	200.00
	JJI	Review mediation Shipp info. And comments	.20	50.00
	JJI	Review, revise, and execute motion continuance/scheduling order; review and revise mediation position statement; review and revise for execution my Declaration; review file	1.80	450.00
	RRD	Court Notification re: Motion for Extension of Time (Discount: reduced		No/Chg

Statement No:

12/09/2020
15-4647

by .10)

11/12/2020	BPS	Emails from OC; TC with JJI regarding strategy; TC with client regarding mediation position statement; emails with client, OC, and JJI; emails regarding mediation strategy	1.10	275.00
	CMJ	Three emails with attorneys and opposing counsel regarding document production. (Discount: reduced by .20)	.10	8.50
	CMJ	Receipt and review of information regarding zoom deposition of client; calendar same and send to client	.30	25.50
	JJI	61 emails re: depos., confirmation, and prep. (Discount: reduced by 4.60)	1.50	375.00
	JJI	Prepare for mediation	1.20	300.00
	JJI	Call with team re: mediation (37:33)	.60	150.00
	JJI	Review additional docs produced by Rave and send in email re: expensing expected RSUs	.40	100.00
	JJI	Confer with Dunn re: mediator, mediation and gameplan	.30	75.00
	RRD	3 emails with opp counsel re: depo notice, McElhaney correspondence, Sharefile Link and link to video depo (Discount: reduced by .20)	.10	25.00
	RRD	Conference w/lacuone re my extensive experience with mediator and mediation strategy	.30	75.00
11/13/2020	BPS	Attend first part of mediation with Shipp; TC with JJI regarding mediation; emails with JJI and client re various matters	1.20	300.00
	JJI	22 emails re: various action items mediation, depo etc. (Discount: reduced by 1.70)	.50	125.00
	JJI	Prepare for and attend mediation (8:30 - 12:59)	4.50	1,125.00
	JJI	Zoom depo. prep with Crane (2-3:15)	1.30	325.00
11/14/2020	JJI	Confer with Dunn re: mediation	.10	25.00
	RRD	Conference w/lacuone re results of mediation and dynamics	.10	25.00
11/15/2020	BPS	Emails with JJI regarding legal issues in case (Discount: reduced by .20)	.10	25.00
	JJI	Start drafting █████ for Crane prep. & circulate to team and Shaw to add to	1.70	425.00
	JJI	3 emails with Shaw re: case logistics (Discount: reduced by .20)	.10	25.00
11/16/2020	BPS	Review LTIP plan and award; review case law sent by JJI; TC with JJI re same	1.10	275.00
	JJI	18 emails re: depo. prep. And meeting (Discount: reduced by 1.30)	.50	125.00
	JJI	Update █████ before prep. Session	.30	75.00
	JJI	Prep. Session with client (2:04 - 3:38)	1.60	400.00
	JJI	Revise █████ and circulate latest draft	.30	75.00
	RRD	Review █████	.10	25.00

Statement No: 12/09/2020
15-4647

11/17/2020	BPS	Depo prep with Crane; strategy call with JJI; 15+ emails with Veritex and OC regarding deposition (Discount: reduced by 1.30)	2.90	725.00
	JJI	18 emails re: depo. and exhibits (Discount: reduced by 1.30)	.50	125.00
	JJI	Call with Scott Mc. re: depo. particulars (15:33)	.30	75.00
11/18/2020	BPS	Defend deposition of Scott Crane via Zoom	3.50	875.00
	BPS	TC with JJI before deposition	.30	75.00
	BPS	Conference w/lacuone in preparation for deposition	.20	50.00
	JJI	Prepare for, log-on, and attend Crane depo. (12:30-4)	3.50	875.00
	JJI	Confer with Shaw re: depo prep	.20	50.00
11/19/2020	BPS	Strategy session with JJI and Client	.60	150.00
	CMJ	Receipt and review of email and Defendant's Response to Plaintiff's Motion for Leave to Amend Scheduling Order and Continue Trial Setting and exhibits (Discount: reduced by .20)		No/Chg
	JJI	Review discovery and those include Randy Gier severance/acceleration & send demand email to McElhaney re: same	.40	100.00
	JJI	Call w/Shaw re: Crane depo. and next steps (33:33)	.60	150.00
	RRD	Court notification re: MSJ (Discount: reduced by .10)		No/Chg
11/20/2020	BPS	Brief review MSJ and opposition to motion to amend; TC conference with JJI regarding same; emails with JJI regarding conference; review scheduling order and 25+ emails with JJI and client re same (Discount: reduced by 1.90)	1.00	250.00
	CMJ	Receipt and review of two emails and Amended Scheduling Order, save to file and calendar new dates	.20	17.00
	CMJ	Four emails from RDG team and Court regarding Defendant's Motions. (Discount: reduced by .20)	.20	17.00
	CMJ	Receipt and review of Defendant's Motion for Summary Judgment and 22 exhibits, save to file and calendar deadlines	.20	17.00
	JJI	29 emails re: MSJ etc. (Discount: reduced by 1.90)	1.00	250.00
	JJI	Call with Shaw re: next steps	.20	50.00
	JJI	Review MSJ; review Response to continuance; circulate & thoughts	1.50	375.00
	JJI	Call with client re: status (11:02)	.20	50.00
	JJI	Draft email to o/c re: conferencing on MSJ continuance proposal for Response etc.	.20	50.00
	JJI	Review order granting continuance, analyze and conferences re: next steps	.10	25.00
	JJI	Call with McElhaney re: extensions/MSJ (31:44)	.50	125.00
	RRD	2 Court notifications and email re: Response in Opposition to Motion, Amended Scheduling order and Client access to DropBox folder (Discount: reduced by .10)	.20	50.00

				Statement No.:	12/09/2020 15-4647
11/22/2020	BPS	Brief review of mediation ADR report results (Discount: reduced by .10)			No/Chg
	JJI	Review ADR report on results of mediation (Discount: reduced by .10)			No/Chg
	TMV	Email from AAA re: Mediator's report (Discount: reduced by .10)			No/Chg
11/23/2020	BPS	Emails with JJI regarding strategy, experts, etc; review report from mediator and email same; draft email to expert regarding same (Discount: reduced by .90)	.40	100.00	
	CMJ	Receipt and review of Mediation Report filed by John Shipp (Discount: reduced by .10)			No/Chg
	CMJ	Three emails with RDG team, opposing counsel and mediator's office regarding final ADR report (Discount: reduced by .20)	.10	8.50	
	CMJ	Update deadlines per Amended Scheduling Order	.20	17.00	
	JJI	13 emails re: expert, McElhaney conversations & MSJ (Discount: reduced by .90)	.40	100.00	
	TMV	Court notification and 2 emails with Shaw, McElhaney and AAA re: ADR report (Discount: reduced by .20)	.20	17.00	
11/24/2020	JJI	Call w/McElhaney & Shaw about MSJ and continuance	.30	75.00	
11/25/2020	BPS	Conference call with potential expert, client and JJI; per Dunn, research damages issue with depreciation of value of stock	1.10	275.00	
	BPS	Confer with Dunn regarding research	.10	25.00	
	CMJ	Request expedited copy of transcript and exhibits per attorney's instructions	.10	8.50	
	CMJ	Five emails with court reporter and attorneys regarding Crane deposition transcript (Discount: reduced by .30)	.20	17.00	
	JJI	Call with expert and team (1 p.m. - 1:51)	.80	200.00	
	RRD	Conference w/Shaw re research needed	.10	25.00	
11/26/2020	JJI	8 emails re: expert materials, etc. (Discount: reduced by .60)	.20	50.00	
	JJI	Confer with Dunn re: expert	.20	50.00	
	RRD	Conference w/lacuone re expert and strategy	.20	50.00	
11/27/2020	CMJ	Receipt and review of two emails from court and Defendant's Motion for Summary Judgment. (Discount: reduced by .10)	.10	8.50	
	RRD	3 court notifications re: MSJ, Notice, and Report of Mediation (Discount: reduced by .20)	.10	25.00	
11/28/2020	JJI	Review withdrawn MSJ notification; review new streamlined MSJ and analysis	.20	50.00	
11/29/2020	BPS	Email from expert; email to client regarding engagement of expert; email with JJI regarding strategy (Discount: reduced by .10)	.10	25.00	
	JJI	3 emails re: transcripts, experts and next steps (Discount: reduced by	.10	25.00	

Statement No: 12/09/2020
15-4647

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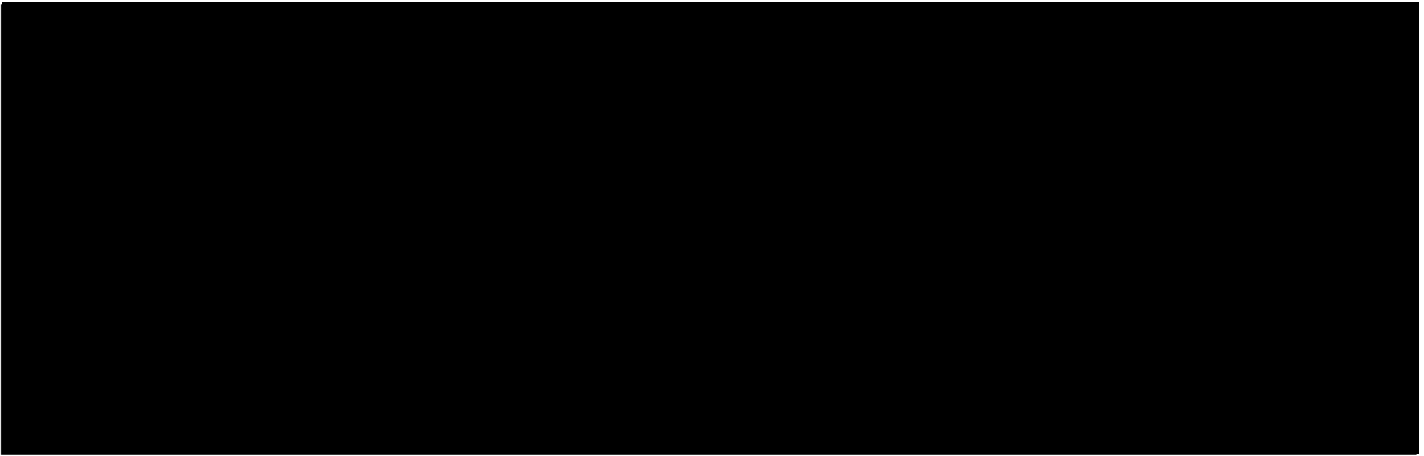
11/30/2020	BPS	Review and analyze [REDACTED] email to JJI regarding same; review MSJ and notice of withdrawal and resetting; emails with OC; emails with JJI; TC to expert; email to client regarding same (Discount: reduced by .40)	1.10	275.00
	CMJ	Two emails with court reporter regarding Crane deposition transcript (Discount: reduced by .10)	.10	8.50
	CMJ	Review and calculate responsive deadline to Defendant's Motion for Summary Judgment on Threshold Contractual Issues; calendar same	.20	17.00
	JJI	Review various motions, transcripts, and decisions on MSJ, need evidence, expert etc.	.60	150.00
	JJI	19 emails and notification re: withdrawal of MSJ and new MSJ (Discount: reduced by 1.30)	.60	150.00
	RRD	2 Court notifications re: Motion to Withdraw MSJ and Notice of Deficiency (Discount: reduced by .10)	.10	25.00

TOTAL FOR CURRENT SERVICES RENDERED	72.10	17,612.50
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	1.60	\$250.00	\$400.00
Joshua J. Iacuone	34.60	250.00	8,650.00
Celeste Jones	2.30	85.00	195.50
Brian P. Shaw	33.40	250.00	8,350.00
Tina M. Vanderburg	0.20	85.00	17.00

Statement No: 12/09/2020
15-4647





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

01/20/2021

Statement No: 16-4757

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
12/01/2020	BPS	Email from client re expert; review Crane transcript; email to expert regarding same; emails with expert; emails with client; emails with expert (Discount: reduced by .20)	.30	75.00
	CMJ	Download and save Crane's deposition transcripts and exhibits.	.30	25.50
	CMJ	Five emails with attorney and court reporter regarding Crane's transcript and exhibits. (Discount: reduced by .30)	.20	17.00
	CMJ	Receive and review notification from court regarding order granting motion to withdraw, motion for summary judgement.	.20	17.00
	CMJ	Two emails with attorney Shaw and attorney lacuone regarding clients deposition transcript and exhibits; download same and save to file. (Discount: reduced by .10)	.10	8.50
	JJI	13 emails re: expert and MSJ issues (Discount: reduced by .90)	.40	100.00
	JJI	Briefly review Crane transcript	.30	75.00
	PAR	Receipt and review court notification re: Order Granting Motion to Withdraw Motion for Summary Judgment (Discount: reduced by .10)		No/Chg
	RRD	Court notification re: Order Granting Motion to Withdraw MSJ (Discount: reduced by .10)		No/Chg
12/03/2020	BPS	TC with client regarding expert matters; TC with expert; emails with paralegal re same	.60	150.00
	CMJ	Two emails with attorney Shaw and attorney lacuone regarding work to be done (Discount: reduced by .10)	.10	8.50

Crane/Lawsuit

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16-4757

	JJI	4 emails re: expert issues (Discount: reduced by .20)	.20	50.00
12/07/2020	BPS	Email from client regarding production to expert; emails with expert; instructions to paralegal (Discount: reduced by .20)	.30	75.00
	CMJ	Review defendant's document production; separate and prepare as materials for expert.	2.00	170.00
	CMJ	Nine emails with attorney Shaw and attorney lacuone regarding work to be done and expert materials (Discount: reduced by .60)	.30	25.50
	CMJ	Review defendants document production and gather documents and materials for expert review.	.40	34.00
	JJI	9 emails re: expert (Discount: reduced by .60)	.30	75.00
12/09/2020	BPS	Emails with expert re retention; work on production of docs to expert; TC with client	.80	200.00
	RRD	4 emails with Client re: QC checkin (Discount: reduced by .30)	.10	25.00
12/11/2020	JJI	Update to-do list	.20	50.00
12/14/2020	BPS	Continue drafting response to MSJ; conduct legal research in support of same	1.50	375.00
	JJI	2 emails re: MSJ response issues (Discount: reduced by .10)	.10	25.00
12/15/2020	BPS	Continue researching and drafting response to motion for summary judgment; TC with client	3.10	775.00
	JJI	3 emails re: facts and filings (Discount: reduced by .20)	.10	25.00
12/16/2020	BPS	Continue drafting MSJ response and researching same; continue drafting MSJ response	3.40	850.00
	BPS	Confer with Dunn regarding MSJ gameplan	.20	50.00
	CMJ	Three emails with attorney Shaw and attorney lacuone regarding response to motion for summary judgment. (Discount: reduced by .20)	.10	8.50
	JJI	7 emails re: expert and discovery issues (Discount: reduced by .40)	.30	75.00
	RRD	Conference w/Shaw re MSJ and ideas	.20	50.00
12/17/2020	BPS	Emails with expert and client regarding call; continue drafting response to MSJ; continue researching same; draft declaration of Crane; TC with client and lacuone; email with OC regarding extension; draft motion and order on same; emails with OC; finalize motion and order for extension and file same via ECF	6.00	1,500.00
	CMJ	Four emails with attorney Shaw and attorney lacuone and court regarding motion for extension of time to file response. (Discount: reduced by .30)	.10	8.50
	JJI	17 emails re: expert, deadlines etc. (Discount: reduced by 1.20)	.50	125.00
	JJI	Research severance issues trying to release earned compensation	.80	200.00
	JJI	Call w/Shaw re: status of MSJ	.20	50.00

Statement No:

01/20/2021
16-4757

				No/Chg
	RRD	Court notification re: Joint Motion for Extension of Time to file Response as to MSJ on Threshold Contractual Issues (Discount: reduced by .10)		
12/18/2020	BPS	TC with JJI regarding severance issues, etc; review entered order on extension; research severance issues	.30	75.00
	CMJ	Receive and review email notifications from court regarding order granting motion for extension. (Discount: reduced by .20)	.10	8.50
	JJI	7 emails re: MSJ response and arguments (Discount: reduced by .50)	.20	50.00
	RRD	Court notification re: ORDER - granting [39] Motion for Extension of Time to File Response/Reply re [36] MOTION for Summary Judgment on Threshold Contractual Issues and briefing deadlines (Discount: reduced by .20)	.10	25.00
12/21/2020	BPS	Continue drafting MSJ; continue researching same; emails with JJI (Discount: reduced by .30)	.50	125.00
	JJI	Draft insert for unfairness of choosing between negotiated severance and company excluding earned comp/benefits as part of a release	.60	150.00
	JJI	5 emails re: MSJ response and other issues (Discount: reduced by .30)	.20	50.00
12/22/2020	BPS	Continue drafting response to MSJ; continue researching same; conference with JJI regarding issues;	6.20	1,550.00
	JJI	22 emails re: MSJ response (Discount: reduced by 1.60)	.60	150.00
	JJI	Research re: [REDACTED]	.50	125.00
	JJI	Review [REDACTED]	.20	50.00
	JJI	Review and revise sections on release and "acceptable" examples that are unfair etc.	.80	200.00
12/23/2020	BPS	TC with JJI; continue drafting response to MSJ; brief time on call with expert; draft declaration of client; emails and TCs with client and JJI; finalize declaration and file same along with response via ECF; email to client regarding same (Discount: reduced by .10)	5.90	1,475.00
	CMJ	Three emails with attorney Shaw and attorney lacuone regarding response to motion for summary judgment. (Discount: reduced by .20)	.10	8.50
	CMJ	Prepare materials for submission to expert.	.60	51.00
	CMJ	Email to expert (Discount: reduced by .10)		No/Chg
	CMJ	Prepare table of contents and table authorities to response in opposition to motion for summary judgement.	.90	76.50
	CMJ	Proofread and revise response in opposition to motion for summary judgement.	.60	51.00
	CMJ	Fifteen emails with attorney Shaw and attorney lacuone regarding materials to expert and response. (Discount: reduced by 1.00)	.50	42.50
	JJI	Review and changes of various drafts of MSJ response & declaration	1.70	425.00
	JJI	25 emails re: MSJ and expert (Discount: reduced by 1.80)	.70	175.00
	JJI	Call with expert (10:30-11:02)	.50	125.00
	JJI	Draft detailed demand re: lack of production and discovery game	.30	75.00

Crane/Lawsuit

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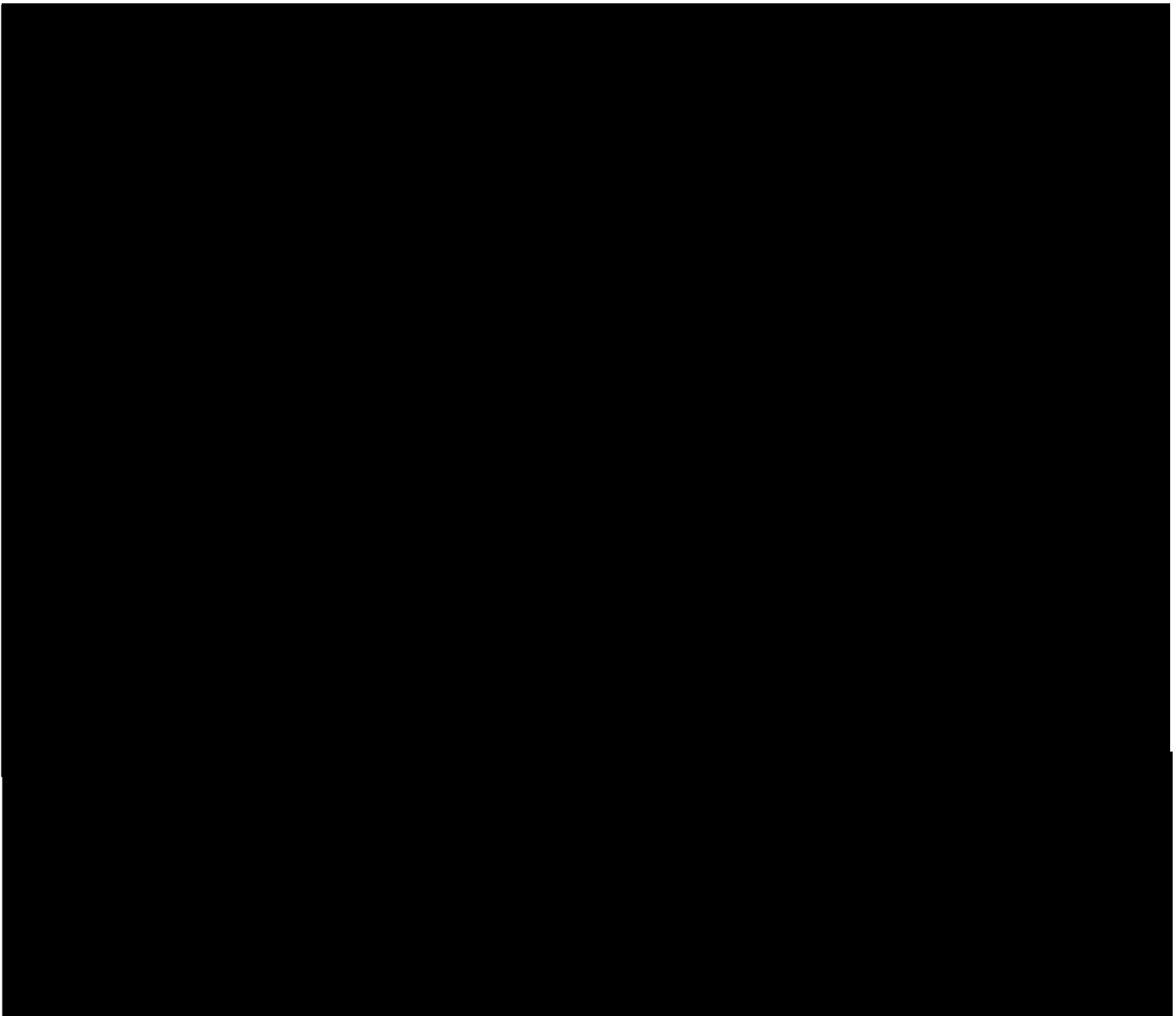
Statement No: 01/20/2021
16-4757

		playing; review file for past letters/requests		
	RRD	Court notification re: Response in Opposition re [36] MOTION for Summary Judgment on Threshold Contractual Issues (Discount: reduced by .10)		No/Chg
12/28/2020	BPS	Emails with client; TCs with expert regarding report issues; address ECF note from court regarding courtesy copies; review local rule for same; TC with expert (Discount: reduced by .30)	.70	175.00
	CMJ	Prepare paper copies of response and opposition to summary judgement; prepare correspondence RE: same for delivery to judge Mazzant; arrange for delivery of same.	.90	76.50
	CMJ	Twelve emails with attorney Shaw, attorney Iacuone regarding requests for paper copies from court. (Discount: reduced by .80)	.40	34.00
	JJI	14 emails re: expert issues & MSJ (Discount: reduced by .90)	.50	125.00
	RRD	Court notification re: compliance with local rules (Discount: reduced by .10)		No/Chg
12/29/2020	JJI	5 emails re: expert issues (Discount: reduced by .30)	.20	50.00
12/30/2020	BPS	8 emails with expert, client and JJI regarding various matters (Discount: reduced by .50)	.30	75.00
	JJI	8 emails re: expert issues, discovery, compel etc. (Discount: reduced by .50)	.30	75.00
12/31/2020	BPS	TC with expert; TC with JJI regarding same	.20	50.00
	JJI	Review draft expert report and 2 emails re: same (Discount: reduced by .10)	.20	50.00
	JJI	Telephone call with Shaw after his call with expert	.10	25.00
TOTAL FOR CURRENT SERVICES RENDERED			49.60	11,096.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.40	\$250.00	\$100.00
Joshua J. Iacuone	11.00	250.00	2,750.00
Celeste Jones	7.90	85.00	671.50
Paralegal	0.00	85.00	0.00
Brian P. Shaw	30.30	250.00	7,575.00

Statement No: 01/20/2021
16-4757





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

03/11/2021

Statement No: 17-4936

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
01/01/2021	JJI	2 emails re: meeting (Discount: reduced by .10)	.10	25.00
01/02/2021	BPS	Review draft expert report; TC with JJI and expert	.80	200.00
	JJI	Call with team re: damages (10:30-11:08)	.60	150.00
	JJI	Prepare for team call re: damages (10:05 - 10:30)	.40	100.00
01/03/2021	BPS	Review revised report; TC with Crane and JJI regarding expert report revisions	.20	50.00
	BPS	TC with client regarding expert and discovery	.10	25.00
	JJI	Review report, calls with Shaw and feedback	.20	50.00
01/04/2021	BPS	Emails with JJI regarding expert strategy; TC with expert; review final report and arrange for service of same; review local rules for expert disclosure; email to expert regarding same; draft notice of expert disclosure; emails regarding transmittal of all; TC with expert	1.00	250.00
	CMJ	Prepare transmittal letter for expert's report. (Discount: reduced by .20)		No/Chg
	CMJ	Prepare Plaintiff's Second Request for Production shell.	.30	25.50
	CMJ	Three emails with attorney Shaw and attorney lacuone regarding expert report and disclosure of same, and work to be done. (Discount:	.10	8.50

Crane/Lawsuit

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17-4936

		reduced by .20)		
	CMJ	Finalize and serve correspondence and expert report on opposing counsel. (Discount: reduced by .20)		No/Chg
	CMJ	Finalize and file Plaintiff's Notice of Expert Disclosure with Court; send file-marked copy to client.	.30	25.50
	JJI	26 emails re: expert and MSJ issues (Discount: reduced by 1.70)	.90	225.00
	JJI	Review final expert report and production to o/c issues	.30	75.00
	JJI	Quick research on impossibility vs. covenant doctrines	.40	100.00
	JJI	Correspondence to o/c re: new depo dates for Board Members	.10	25.00
	RRD	Court notification re: notice of discovery disclosure (Discount: reduced by .10)		No/Chg
01/05/2021	JJI	6 emails re: reports and depositions (Discount: reduced by .40)	.20	50.00
01/07/2021	JJI	7 emails and Pizza Inn press release (Discount: reduced by .50)	.20	50.00
	JJI	Review Rave Reply in Support of MSJ and analysis	.30	75.00
	RRD	Court notification re: Unopposed MOTION for Leave to File Summary Judgment Reply Brief in Excess of the Local Rules Page Limit (Discount: reduced by .10)		No/Chg
	RRD	Court notification re: Reply to Response to Motion re Motion for Summary Judgment on Threshold Contractual Issues	.10	25.00
01/08/2021	BPS	Review and analyze reply to MSJ; TC from Spindler; review and revise 2nd request for production; emails with JJI; email to OC regarding insurance policy; email to client regarding discovery; Confer with Dunn; TC with JJI regarding MSJ response;	1.20	300.00
	BPS	TC with Iacuone regarding Sur-Reply (12:40)	.20	50.00
	JJI	24 emails re: MSJ Reply etc. (Discount: reduced by 1.60)	.80	200.00
	JJI	Review proposed discovery	.10	25.00
	JJI	Call with Shaw re: sur-reply (12:40)	.20	50.00
	RRD	Court notification re: ORDER - granting Motion for Leave to File Summary Judgment Reply Brief in Excess of the Page Limit (Discount: reduced by .10)		No/Chg
	RRD	Conference w/Shaw re MSJ and strategy	.20	50.00
01/11/2021	BPS	Emails with OC; draft sur-reply; email to JJI regarding same; review and revise same; emails with JJI; email to OC regarding motion for leave; TC with client regarding discovery; email to expert; draft motion for leave to file sur-reply; draft motion for leave; review local rules (Discount: reduced by .30)	1.50	375.00
	JJI	12 emails re: Rave depo. scheduling (Discount: reduced by .90)	.30	75.00
	JJI	Review Sur-Reply and revise/input	.20	50.00
	JJI	Review 2nd RFP issues	.10	25.00
01/12/2021	BPS	Review and revise sur-reply; TC with expert regarding doc requests;	1.40	350.00

Statement No: 03/11/2021
17-4936

		continue review and revisions to sur-reply; TC with Spindler; emails with OC re depo call; TC with JJI and OC re depositions; emails with JJI re sur-reply; finalize and file sur-reply; finalize and serve discovery requests		
	JJI	Review, feedback and approve latest discovery set for expert/damages issues	.20	50.00
	JJI	31 emails re: sur- reply, insurance policy and depositions. (Discount: reduced by 2.30)	.80	200.00
	JJI	Review insurance policy for Rave	.10	25.00
	JJI	Review and approve updated Sur-Reply for filing	.20	50.00
	JJI	Call with Scott McElhany re: depo dates (12:30 - 12:41)	.30	75.00
	JJI	Update TDL	.10	25.00
	RRD	Court notification re: sur-reply to Reply to Response to Motion re Motion for Summary Judgment on Threshold Contractual Issues	.10	25.00
01/14/2021	JJI	5 emails re: last call for discovery propounded (Discount: reduced by .30)	.20	50.00
01/15/2021	BPS	Emails with JJI regarding amendment deadline	.10	25.00
	JJI	9 emails re: pleading deadline and possible new claims (Discount: reduced by .70)	.20	50.00
01/21/2021	BPS	Address issues with Rave's insurance policy; analyze same and email with JJI regarding same (Discount: reduced by .10)	.30	75.00
	JJI	11 emails re: insurance policy (Discount: reduced by .80)	.30	75.00
01/22/2021	BPS	Email with Team regarding discovery and deadlines (Discount: reduced by .10)		No/Chg
	JJI	Email re: DL's and discovery (Discount: reduced by .10)		No/Chg
	PAR	Email with Shaw and Paralegal Vanderburg re: cases to do list and discovery (Discount: reduced by .10)		No/Chg
	TMV	Email with paralegal Jones and Shaw re: case deadlines and discovery status	.10	8.50
01/23/2021	JJI	3 emails re: depositions and scheduling (Discount: reduced by .20)	.10	25.00
01/25/2021	BPS	Emails with JJI and OC regarding depositions; review topics for corporate rep depo (Discount: reduced by .60)	.30	75.00
	CMJ	Prepare amended notice of deposition of defendant's corporate representative.	.20	17.00
	CMJ	Prepare notice of deposition of Robert Page	.10	8.50
	CMJ	Prepare notice of deposition of Brian Bares.	.10	8.50
	JJI	14 emails re: depositions, notices etc. (Discount: reduced by 1.00)	.40	100.00
	JJI	Directive re: NODs, corp. rep. categories, and finalize strategy	.30	75.00

03/11/2021
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01/26/2021	BPS	Telephone call with lacuone re: NOD and next steps	.10	25.00
	JJI	4 emails re: NOD and corp. rep. categories (Discount: reduced by .30)	.10	25.00
	JJI	Short call w/Shaw re: NOD and corp. rep categories	.10	25.00
01/27/2021	BPS	Emails (9x) with lacuone regarding [REDACTED] gameplan (Discount: reduced by .60)	.30	75.00
	JJI	9 emails re: depos given Shaw [REDACTED] (Discount: reduced by .60)	.30	75.00
01/28/2021	JJI	Update TDL	.10	25.00

TOTAL FOR CURRENT SERVICES RENDERED	18.30	4,377.00
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.40	\$250.00	\$100.00
Joshua J. lacuone	9.20	250.00	2,300.00
Celeste Jones	1.10	85.00	93.50
Paralegal	0.00	85.00	0.00
Brian P. Shaw	7.50	250.00	1,875.00
Tina M. Vanderburg	0.10	85.00	8.50

Statement No. 03/11/2021
17-4936





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

03/23/2021

Statement No: 18-4992

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
02/01/2021	JJI	3 emails re: dates etc. (Discount: reduced by .20)	.10	25.00
	JJI	Call w/McElhany re: depositions (19:44)	.30	75.00
	RRD	2 emails with McElhany, Josh and Brian re: reports of experts (Discount: reduced by .10)	.10	25.00
02/02/2021	BPS	Emails with client	.10	25.00
	JJI	Review Rave's expert reports and forward to our expert	.50	125.00
	JJI	11 emails re: experts, depositions etc. (Discount: reduced by .80)	.30	75.00
	JJI	Discuss w/Spindler re: testimony	.20	50.00
	JJI	Review scheduling order, call with Shaw, call with Scott Crane, [REDACTED]	.20	50.00
02/03/2021	BPS	Review and analyze expert reports; emails with client and JJI re same; emails from OC re depositions (Discount: reduced by .20)	.70	175.00
	JJI	11 emails re: whether to ask for expert designations (Discount: reduced by .70)	.40	100.00
	JJI	Confer with Dunn re: expert	.10	25.00
	RRD	Conference w/lacuone re expert issue	.10	25.00

Statement No: 03/23/2021
18-4992

02/04/2021	JJI	19 emails re: Rave expert reports and next steps/options (Discount: reduced by 1.30)	.60	150.00
	TMV	Email with Client and team re: scheduled client call (Discount: reduced by .10)		No/Chg
02/05/2021	BPS	Emails with JJI and OC re depositions and expert issues	.20	50.00
	JJI	12 emails with client/opposing counsel re: depo dates (Discount: reduced by .80)	.40	100.00
02/06/2021	JJI	Attend call re: experts, rebuttal, and depositions	.20	50.00
02/07/2021	JJI	2 emails re: Rave's witnesses depositions (Discount: reduced by .20)		No/Chg
02/08/2021	BPS	Emails with JJI and client re depositions, etc	.20	50.00
	JJI	Draft and revise and bless various NODs to Rave	.30	75.00
	JJI	13 emails and directives re: depositions/categories/dates/NODs (Discount: reduced by .80)	.50	125.00
	TMV	2 emails with team, opp counsel and paralegal re: notices of deposition (Discount: reduced by .20)		No/Chg
02/09/2021	JJI	13 emails re: status/extension on discovery etc. (Discount: reduced by .90)	.40	100.00
	RRD	2 emails with court reporter re: Receipt and review of Court communication, login to Court website, distribute to team, review, organize and analyze e-filed credentials for depo (Discount: reduced by .20)		No/Chg
	TMV	11 emails with Josh, Brian, Court Reporter re: depositions (Discount: reduced by .80)	.30	25.50
	TMV	Update calendar 4x (Discount: reduced by .40)		No/Chg
02/10/2021	BPS	Email with client regarding [REDACTED] (Discount: reduced by .10)		No/Chg

TOTAL FOR CURRENT SERVICES RENDERED	6.20	1,500.50
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.20	\$250.00	\$50.00
Joshua J. Iacune	4.50	250.00	1,125.00
Brian P. Shaw	1.20	250.00	300.00
Tina M. Vanderburg	0.30	85.00	25.50

Statement No: 03/23/2021
18-4992





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(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

04/15/2021

Statement No: 19-5089

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
03/03/2021	BPS	TC with OC regarding withdrawal; emails with same; email to JJI and client re same; TC with client re same	.30	75.00
	JJI	8 emails re: extensions and JW withdrawal (Discount: reduced by .50)	.30	75.00
03/10/2021	BPS	Emails (6x) with OC and JJI re depositions (Discount: reduced by .40)	.20	50.00
	JJI	6 emails re: new counsel and depositions (Discount: reduced by .40)	.20	50.00
03/16/2021	BPS	Email with JJI and OC re substitution (Discount: reduced by .10)		No/Chg
	JJI	4 emails re: new counsel, dates for depositions etc. (Discount: reduced by .30)	.10	25.00
03/17/2021	BPS	TC from [REDACTED] re substitution; email to JJI re same	.30	75.00
	JJI	9 emails re: [REDACTED] (Discount: reduced by .60)	.30	75.00
03/18/2021	JJI	2 emails re: new counsel (Discount: reduced by .10)	.10	25.00
03/19/2021	JJI	2 emails re: new counsel and dates (Discount: reduced by .10)	.10	25.00
	TMV	2 emails with Shaw re: cancellation of depositions (Discount: reduced)	.10	8.50

Crane/Lawsuit

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Statement No: 04/15/2021
19-5089

by .10)

03/22/2021	TMV	Update calendar 3x (Discount: reduced by .20)	.10	8.50
	TMV	6 emails with Court Reporter re: cancellation of depositions (Discount: reduced by .40)	.20	17.00
03/24/2021	JJI	5 emails re: new Littler counsel and review bio (Discount: reduced by .30)	.20	50.00
	JJI	Confer with Dunn re: new counsel	.20	50.00
	RRD	Conference w/lacuone re new counsel and my expertise w/same	.20	50.00
03/30/2021	BPS	Email to new OC checking on appearance (Discount: reduced by .10)		No/Chg
	JJI	4 emails re: new counsel substituting in case for Rave (Discount: reduced by .30)	.10	25.00
	JJI	Review motion and order on law firm withdrawal	.10	25.00
	RRD	Receipt and review court notification re: unopposed motion to withdraw filed by Rave (Discount: reduced by .10)		No/Chg
	TMV	Court notifications and email to team re: Motion to Withdraw and substitute and proposed order (Discount: reduced by .10)	.20	17.00
	TMV	Receipt and review of Court communication, login to Court website, distribute to team, review, organize and analyze e-filed Motion to withdraw and proposed order (DOC 48)	.20	17.00
03/31/2021	JJI	Review Order granting substitution and look up all Littler lawyers	.10	25.00
	RRD	Court notification re: Order on Motion to Withdraw filed by Rave (Discount: reduced by .10)		No/Chg

TOTAL FOR CURRENT SERVICES RENDERED	3.60	768.00
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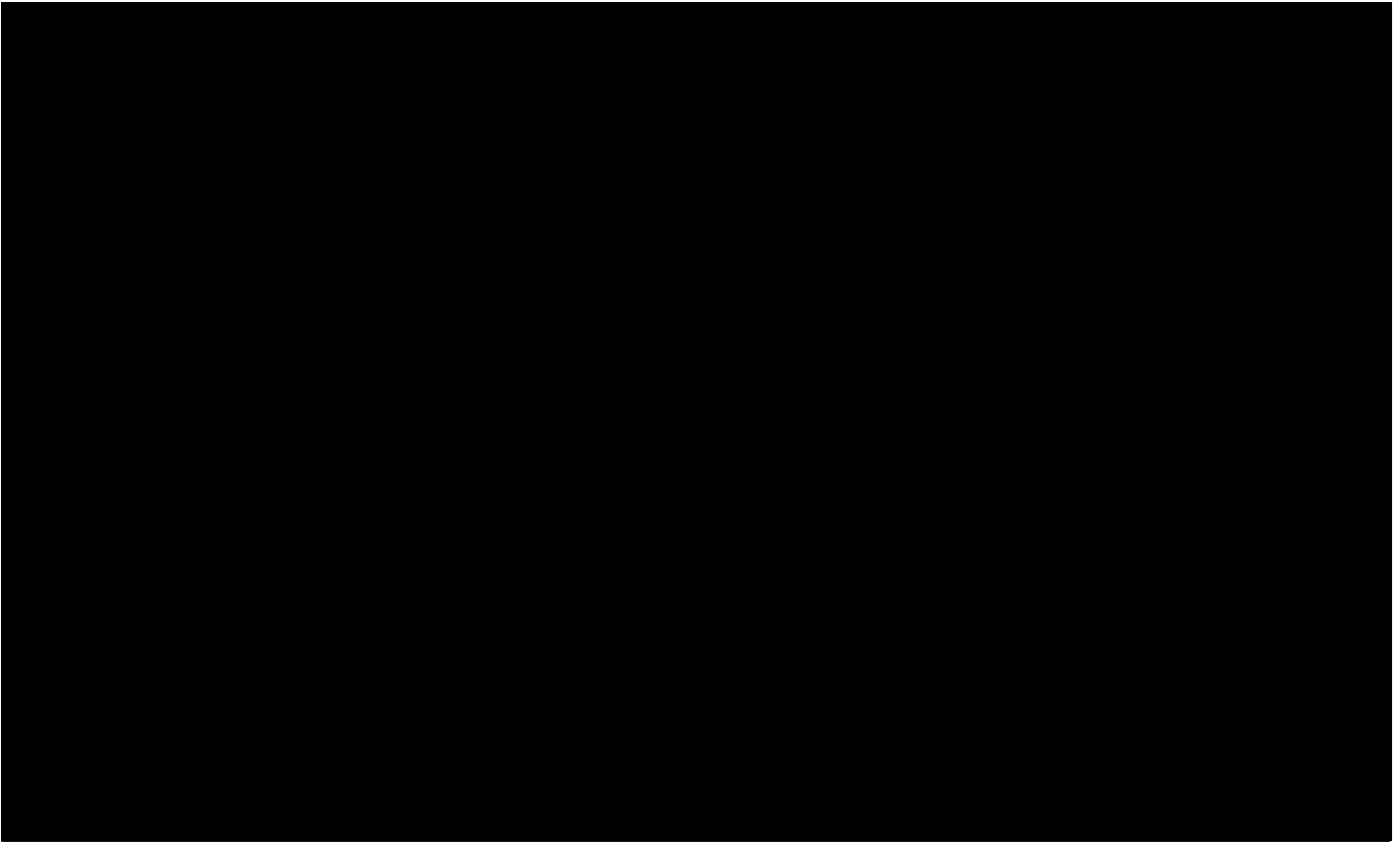
RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.20	\$250.00	\$50.00
Joshua J. lacuone	1.80	250.00	450.00
Brian P. Shaw	0.80	250.00	200.00
Tina M. Vanderburg	0.80	85.00	68.00

TOTAL CURRENT CHARGES	768.00
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Statement No: 04/15/2021
19-5089





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

05/17/2021

Statement No: 20-5188

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
04/01/2021	BPS	Email from OC re requested extension of discovery; review scheduling order; email to client; emails with OC; email with client re depositions	.40	100.00
	JJI	5 emails re: rescheduling depositions (Discount: reduced by .30)	.20	50.00
	RLT	Attention to four (4) e-mails with attorney Shaw and paralegal Vanderburg regarding paralegal assignment and status of pleadings (Discount: reduced by .20)	.20	17.00
	RLT	Began updating pleadings with proper name and docket no	.30	25.50
	RLT	Attention to scheduling tentative deposition dates for Schwarz and Page	.10	8.50
04/02/2021	BPS	7 emails with client re depositions; research Clairday appeal; emails with OC and client re depositions (Discount: reduced by .40)	.30	75.00
	JJI	7 emails re: depositions dates and update on status (Discount: reduced by .40)	.30	75.00
04/08/2021	BPS	Email (2x) to OC re depositions (Discount: reduced by .10)	.10	25.00
	JJI	2 emails with counsel re: Rave depositions (Discount: reduced by .10)	.10	25.00
04/09/2021	JJI	3 emails re: depo dates for Rave (Discount: reduced by .20)	.10	25.00
	RLT	Attention to calendaring tentative deposition date for witness Bares per attorney Shaw and "tickler" email reminders	.20	17.00

Crane/Lawsuit

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20-5188

04/13/2021	BPS	Review and respond to email from OC re depos; email to client re same (Discount: reduced by .10)	.10	25.00
	JJI	8 emails re: depos and availability (Discount: reduced by .50)	.30	75.00
04/16/2021	BPS	Emails with Team and opp counsel re responses and objections (Discount: reduced by .10)	.10	25.00
	RRD	Email with opp counsel, Josh and B. Shaw re: defendant's Objections and responses to Plaintiff's second request for Production	.10	25.00
04/17/2021	RLT	Receipt and review of Rave's 2nd responses to discovery; upload same to file	.20	17.00
04/19/2021	BPS	Emails with JJI re Rave's discovery responses; review same; email from OC re PO; Call with lacuone; email to same (Discount: reduced by .30)	.60	150.00
	JJI	Review Rave answers to discovery and feedback/directive	.20	50.00
	JJI	Review o/c comments and APO issue strategy & call with Shaw	.20	50.00
	JJI	5 emails re: APO and not waiting etc (Discount: reduced by .30)	.20	50.00
04/21/2021	BPS	Email from OC re PO (Discount: reduced by .10)		No/Chg
	BPS	Brief review of proposed PO	.10	25.00
	JJI	11 emails re: APO and demand for docs (Discount: reduced by .60)	.50	125.00
	JJI	Review proposed APO to court	.10	25.00
	JJI	Update TDL	.20	50.00
	RLT	Receipt and review of court filing notification regarding Protective Order; upload and save same	.20	17.00
	RRD	Court notification re: unopposed motion for protective order (Discount: reduced by .10)		No/Chg
04/22/2021	JJI	Review link and instructions re: Rave suppl. Production	.10	25.00
	JJI	Review executed APO	.10	25.00
	JJI	5 emails re: supplemental doc production (Discount: reduced by .40)	.10	25.00
	JJI	Confer with Dunn re: supp prod	.10	25.00
	RLT	Attention to four (4) e-mails with team regarding court filings and discovery (Discount: reduced by .30)	.10	8.50
	RRD	Court notification re: Protective Order (Discount: reduced by .10)		No/Chg
	RRD	Conference w/lacuone re supplemental production	.10	25.00
04/26/2021	BPS	Email (4x) to OC re depo of Schwartz (Discount: reduced by .20)	.20	50.00
	JJI	4 emails re: Schwarz depo dates (Discount: reduced by .20)	.20	50.00

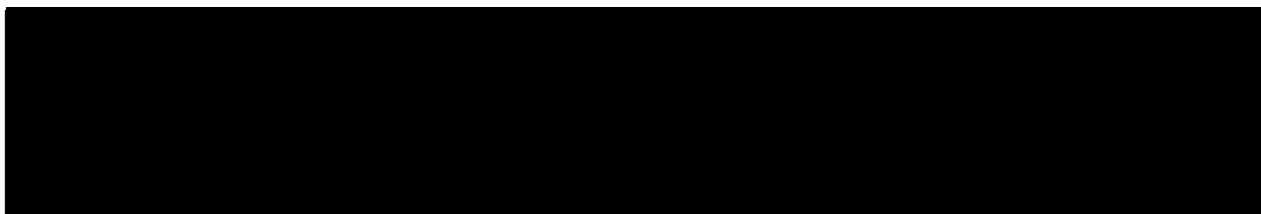
Statement No: 05/17/2021
20-5188

04/27/2021	BPS	Review and respond to email from OC regarding depositions; confer with JJI re same; emails with OC; email to client (Discount: reduced by .40)	.40	100.00
	BPS	Confer with Iacuone regarding depositions	.20	50.00
	JJI	6 emails re: depositions (Discount: reduced by .40)	.20	50.00
	JJI	Conference with Shaw re: depositions	.20	50.00
	JJI	Confer with Dunn re: deposing of Schwartz	.20	50.00
	RLT	Attention to one (1) e-mails from B. Shaw regarding drafting amended deposition notices (Discount: reduced by .10)		No/Chg
	RRD	Conference w/Iacuone re [REDACTED]	.20	50.00
04/28/2021	JJI	4 emails re: depositions etc. (Discount: reduced by .30)	.10	25.00
	RLT	Attention to four (4) e-mails regarding amended deposition notices and logistics of same (Discount: reduced by .30)	.10	8.50
04/29/2021	RLT	Attention to drafting amended deposition notices of Schwartz and Page	.30	25.50
04/30/2021	BPS	Review depo notices for Schwarz and Page; email to paralegal re same; review depo notice for Bares (Discount: reduced by .10)	.30	75.00
	JJI	5 emails re: depositions etc. (Discount: reduced by .30)	.20	50.00
	RLT	Attention to five (5) e-mails with attorneys Iacuone and court reporter regarding scheduling depositions (Discount: reduced by .30)	.20	17.00
	RLT	Revised, finalized, converted and served amended deposition notices upon opposing counsel for Schwarz and Page; receipt, review and save proof of service of same	.40	34.00
	RLT	Convert and served amended deposition notices upon opposing counsel for Bare; receipt, review and save proof of service of same	.20	17.00

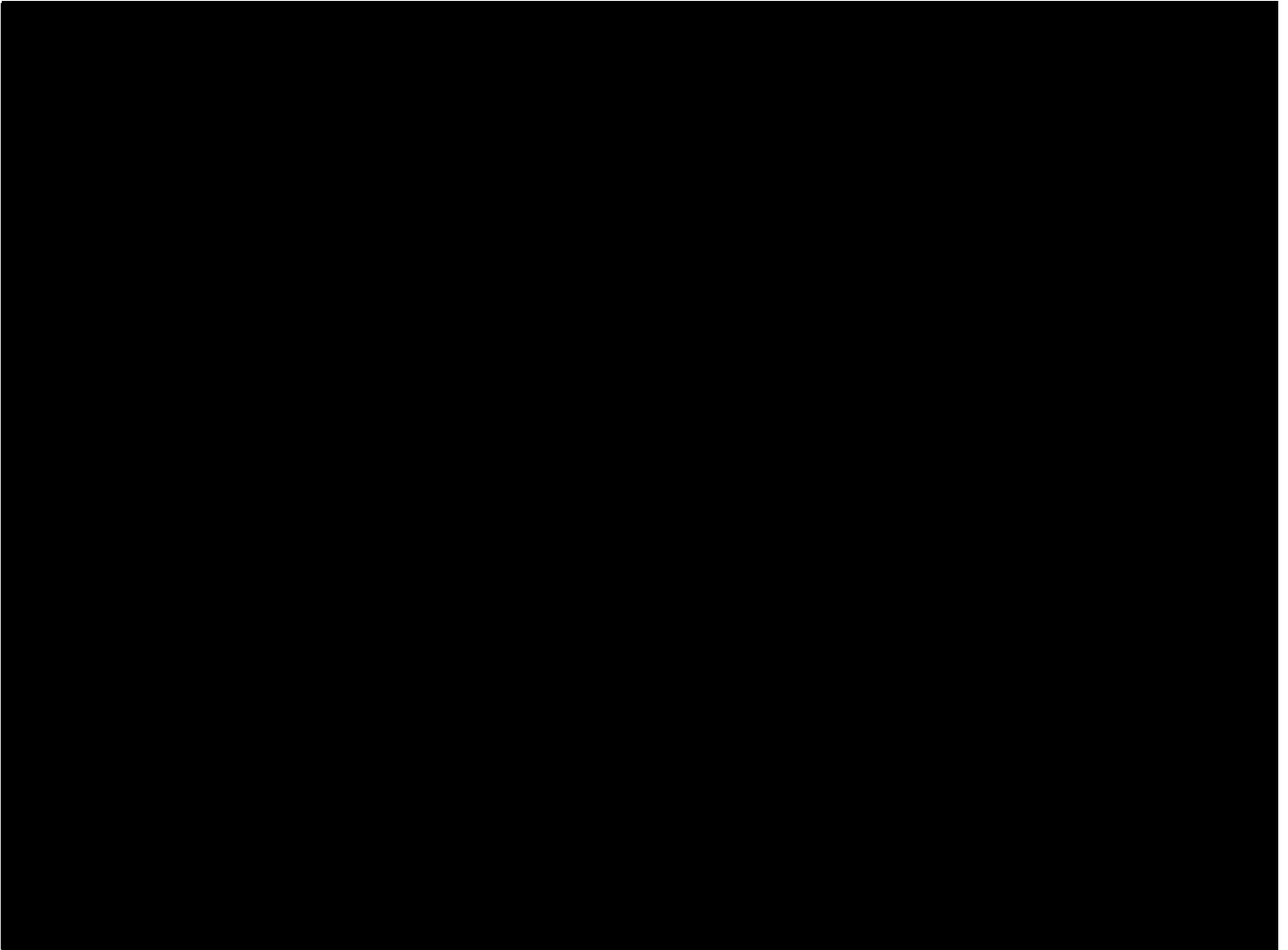
TOTAL FOR CURRENT SERVICES RENDERED	9.60	1,987.50
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.40	\$250.00	\$100.00
Joshua J. Iacuone	3.90	250.00	975.00
Brian P. Shaw	2.80	250.00	700.00
Rhonda L Thomas	2.50	85.00	212.50



Statement No: 05/17/2021
20-5188





500 N. AKARD ST., SUITE 1900
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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT **ATTORNEY/CLIENT COMMUNICATION**

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

06/21/2021

Statement No: 21-5348

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
05/03/2021	BPS	Email to client re Schwarz depo	.10	25.00
	BPS	Confer with lacuone regarding deposition of Schwartz	.20	50.00
	JJI	Meeting w/Shaw re: Schwarz depo. and 7 emails re: same	.50	125.00
	RLT	Attention to three (3) e-mails with team regarding Schwarz deposition (Discount: reduced by .20)	.10	8.50
	RLT	Update calendar (x2) with deposition of Mark Schwarz and Bob Page and "tickler" email reminders	.40	34.00
05/04/2021	BPS	Emails with client re prep for Schwarz depo (Discount: reduced by 1.00)	.90	225.00
	JJI	19 emails re: depositions and preparing for same (Discount: reduced by 1.00)	.90	225.00
05/05/2021	RLT	Forward deposition calendar invites to client (Discount: reduced by .10)		No/Chg
05/07/2021	BPS	TC with client re depo; emails from OC re Zoom depo; email with JJI re same	.20	50.00
	JJI	4 emails re: Schwarz and zoom depo issues (Discount: reduced by .20)	.20	50.00
	RLT	Attention to two (2) e-mails with OC counsel regarding logistics of	.10	8.50

Crane/Lawsuit

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Statement No: 06/21/2021
21-5348

conducting depositions via Zoom (**Discount: reduced by .10**)

05/08/2021	BPS	Review production and emails with client re Schwarz depo	.20	50.00
	JJI	2 emails re: Schwarz depo. and prep. (Discount: reduced by .10)	.10	25.00
	RLT	Attention to seven (7) e-mails with attorney Shaw and Client regarding depositions and discovery (Discount: reduced by .40)	.30	25.50
	RLT	Receipt and review of waiver for Littler conference room (Discount: reduced by .10)		No/Chg
05/09/2021	JJI	3 emails re: remote depo. scheduling (Discount: reduced by .20)	.10	25.00
	RLT	Attention to one (1) e-mail with court reporting service regarding logistics of deposition	.10	8.50
	RLT	Attention to six (6) e-mails with team regarding Rave's net worth, deadlines, strategy and status (Discount: reduced by .30)	.30	25.50
05/10/2021	BPS	Prepare for deposition of Schwarz; TC with JJI re strategy; TC with client; emails with OC re depo; TC with client re depo; TC with OC re depo	1.00	250.00
	JJI	Search emails re: corp. rep./Schwarz depo.	.20	50.00
	JJI	Review additional materials and forwarded to expert for review	.30	75.00
	JJI	Meeting and approve notice of passing Schwarz depo. for in-person	.30	75.00
	JJI	16 emails re: depositions etc. (Discount: reduced by 1.10)	.50	125.00
	RLT	Attention to 20 e-mails with team and OC regarding depositions scheduled and logistics of same (Discount: reduced by 1.10)	.90	76.50
05/11/2021	BPS	Emails with paralegal and review of proposed depo topics for Rave	.10	25.00
	JJI	5 emails re: expert issues & report (Discount: reduced by .30)	.20	50.00
	RLT	Review of file material for list of FRCP 30(b)(6) topics	.30	25.50
	RLT	Update amended deposition notice for corporate rep for Rave	.20	17.00
	RLT	Attention to eight (8) e-mails with attorney lacuone regarding deposition topics and deposition schedule (Discount: reduced by .50)	.30	25.50
05/12/2021	BPS	Emails with JJI re depo topics for corp rep of Rave	.10	25.00
	JJI	Review and approve corp. rep. categories	.20	50.00
05/14/2021	BPS	Confer with Dunn regarding Rave gameplan	.20	50.00
	JJI	6 emails re: Bares depo. & COVID issues (Discount: reduced by .40)	.20	50.00
	RLT	Attention to one (1) e-mail with OC regarding COVID issues and depositions	.10	8.50
	RRD	Conference w/Shaw re Rave production and strategy	.20	50.00
05/17/2021	BPS	Emails with OC re Zoom depositions; conference with JJI re same; prepare for Bares depo; Zoom call with Crane re same; TC with JJI;	5.30	1,325.00

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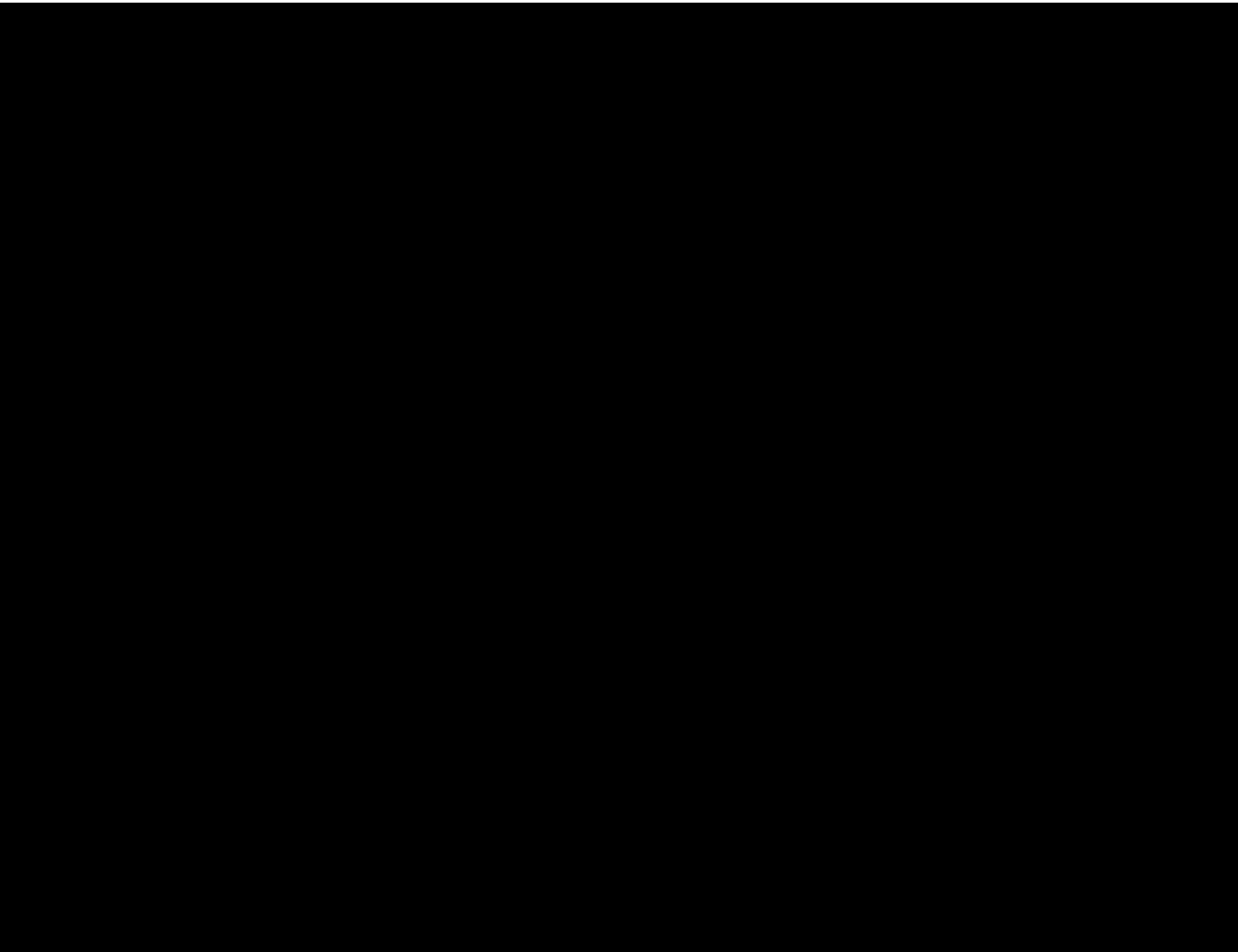
		continue review of relevant docs for deposition of Bares; review Rave production; research issues on Edgar		
	JJI	Call with [REDACTED]	.20	50.00
	JJI	Assist with depo. prep. and conferences w/Shaw	.80	200.00
	RLT	Attention to 25 e-mails with attorneys Shaw and Iacune regarding Zoom depositions, topics, documents for depositions and finalizing depo notice (Discount: reduced by 2.00)	.50	42.50
05/18/2021	BPS	Continue prep for Bares depo; conduct Bares deposition	4.80	1,200.00
	JJI	16 emails re: depositions etc. (Discount: reduced by 1.00)	.60	150.00
	JJI	Listen Bares depo./thoughts to Shaw	2.40	600.00
	RLT	Attention to two (2) e-mails with court reporter regarding exhibits (Discount: reduced by .10)	.10	8.50
05/19/2021	BPS	Emails with client re depo; TC with same; email with OC re Page depo (Discount: reduced by .20)	.20	50.00
	JJI	3 emails re: Bares depo. & Page upcoming depo. (Discount: reduced by .20)	.10	25.00
	JJI	Help prepare/meeting re: Bares depo.	.30	75.00
	RLT	Attention to eleven (11) e-mails with team and court reporter confirming logistics for deposition scheduled (Discount: reduced by .70)	.40	34.00
05/20/2021	BPS	Brief preparation for Page depo; conduct Page depo; TC with client re strategy	3.20	800.00
	JJI	Call with Crane re: strategy moving forward (19:33)	.30	75.00
	JJI	Attend Bares depo. (1:30-2:52)	1.40	350.00
	JJI	Review various policies re: company conduct, comp committee, audit committee	.50	125.00
	RLT	Attention to one (1) e-mails with attorney B. Shaw regarding court reporter for deposition (Discount: reduced by .10)		No/Chg
05/21/2021	BPS	Emails with OC re depositions and scheduling order; review draft amendment to same (Discount: reduced by .10)	.10	25.00
	JJI	Review draft motion for entry of scheduling order extensions	.20	50.00
	JJI	5 emails w/counsel re: new deadlines/depo etc. (Discount: reduced by .30)	.20	50.00
	JJI	Start Schwarz depo. outline	1.30	325.00
	RLT	Attention to three (3) e-mails with team and OC regarding scheduling additional depositions (Discount: reduced by .20)	.10	8.50
	RLT	Receipt and review of motion to amend scheduling order	.20	17.00
	RRD	Court notification re: filing of Joint Motion to Amend Scheduling Order	.10	25.00
05/24/2021	JJI	Call with Scott re: status and Schwarz depo. date (11:45-11:49)	.10	25.00
	JJI	Review various pre-trial orders from Court	.20	50.00

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	JJI	18 emails re: Schwarz depo. (Discount: reduced by 1.20)	.60	150.00
	JJI	Conferences, call with o/c and review schedules re: Schwarz depo.	.40	100.00
	RLT	Attention to eleven (11) e-mails with parties regarding document exchange, upcoming deadlines and depositions (Discount: reduced by .70)	.40	34.00
	RLT	R/R Order regarding Exhibits; download same and save to the RDG system; distribute same	.20	17.00
	RLT	R/R Amended Scheduling Order; download same and save to the RDG system; distribute same	.20	17.00
	RRD	Email with team and 2 court notifications re: Orders (Discount: reduced by .30)		No/Chg
05/25/2021	BPS	Review and revise Schwarz depo notice and 30(b)(6) topics; emails with Rhonda and JJI re same	.20	50.00
	JJI	Work on Schwarz depo. outline/review file for same	.80	200.00
	JJI	Start cutting Bafundo depo. for pretrial designation	1.80	450.00
	JJI	Prepare for and list of topics for call with o/c on pre-trial issues	.30	75.00
	JJI	Attend call with o/c on pre-trial issues	.20	50.00
	JJI	Directives and communications re: corp. rep. depo. etc.	.20	50.00
	JJI	Review email on Bares video issue (Discount: reduced by .10)		No/Chg
	JJI	Confer with Dunn re: Schwartz previous deposition	.30	75.00
	RLT	Update calendar entries with new deadlines in amended scheduling order and "tickler" email reminders	.60	51.00
	RLT	Attention to 19 e-mails with team regarding deposition schedule, deadlines, logistics of depos, status and strategy (Discount: reduced by 1.30)	.60	51.00
	RLT	Update calendar entries with new deadlines in amended scheduling order and "tickler" email reminders	.60	51.00
	RRD	Conference w/lacuone re strategy re my prior depo of Schwartz	.30	75.00
05/26/2021	JJI	8 emails re: NOD for Schwarz/corp. rep. (Discount: reduced by .60)	.20	50.00
	JJI	Review, add-to, revise and serve corp. rep. & Schwarz NOD to Littler	.60	150.00
	RLT	Attention to ten (10) e-mails with team regarding deposition of Schwarz (Discount: reduced by .70)	.30	25.50
05/27/2021	RLT	Attention to one (1) e-mail with court reporting service regarding missing exhibit from Bares deposition (Discount: reduced by .10)		No/Chg
05/31/2021	JJI	2 emails re: pre-trial order to-dos (Discount: reduced by .20)		No/Chg
TOTAL FOR CURRENT SERVICES RENDERED			42.40	9,395.50

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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.60	\$250.00	\$150.00
Joshua J. Iacuone	17.70	250.00	4,425.00
Brian P. Shaw	16.80	250.00	4,200.00
Rhonda L Thomas	7.30	85.00	620.50





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

08/03/2021

Statement No: 23-5518

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
06/01/2021	BPS	Assess revised scheduling order and prep required for trial; conference with JJI re same	.50	125.00
	JJI	Meeting with Shaw re: various pre-trial order action items etc.	.30	75.00
	JJI	2 emails re: pre-trial order and Charge and other issues (Discount: reduced by .20)		No/Chg
06/02/2021	BPS	Emails with OC re corp rep topics (Discount: reduced by 1.10)	.60	150.00
	JJI	17 emails re: corp. rep. topics & Bares and pre-trial order action items (Discount: reduced by 1.10)	.60	150.00
	RLT	Prepare page/line designations for Brian Bares for attorney review	.30	25.50
	RLT	Attention to 17 e-mails with team regarding pre-trial order, action items, corporate representative topics (Discount: reduced by 1.30)	.40	34.00
	RLT	Calendar deposition of Schwarz and "tickler" email reminders	.20	17.00
06/03/2021	BPS	TC with OC re corp rep topics	.20	50.00
06/07/2021	BPS	Review scheduling order; TC with JJI re strategy issues with trial; review proposed limine from OC; emails with OC	.40	100.00
	JJI	Detailed email to client re: Schwarz depo./exhibits for same and 4 follow-up emails (Discount: reduced by .30)	.30	75.00

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	JJI	Review Rave's proposed limine, and review BPS comments/redlines to same & approve	.30	75.00
	JJI	Telephone call with Shaw re: trial strategy	.20	50.00
	RLT	Attention to eleven (11) e-mails with team regarding deposition topics, status, strategy and action items (Discount: reduced by .80)	.30	25.50
06/08/2021	AOR	Review and analysis of Texas law regarding the requisite evidence necessary to establish net worth	1.30	325.00
	AOR	Prepare a Joint Stipulation of Rave's Net Worth	.90	225.00
	AOR	6 emails with Iacuone and Shaw regarding requisite evidence of net worth and the joint stipulation of Rave's net worth (Discount: reduced by .40)	.20	50.00
	BPS	Review and respond to emails from client; begin Bares depo designations; complete designations; emails with OC re pre-trial matters; review and respond to email from OC re limine; emails with OC w various pre-trial matters	3.50	875.00
	JJI	Review significant objections to corp. rep. categories & feedback	1.30	325.00
	JJI	43 emails re: NOD and deposition issues (Discount: reduced by 3.30)	1.00	250.00
	JJI	Start review Crane transcript for any limine issues	1.50	375.00
	JJI	Draft research on net worth for info. needed to prove at trial	.20	50.00
	RLT	Attention to eleven (11) e-mails with team regarding depositions status, strategy and action items. (Discount: reduced by .80)	.30	25.50
	TMV	2 emails with Josh and Brian re: Motions in Limine (Discount: reduced by .20)		No/Chg
06/09/2021	AOR	Review and analysis of Texas law regarding the timing at which net worth is most relevant for purposes of exemplary damages	.30	75.00
	AOR	Review and revise the Joint Stipulation of Rave's Net Worth	.10	25.00
	AOR	4 emails with Iacuone and Shaw regarding the parties' Joint Stipulation of Dismissal of Rave's Net Worth (Discount: reduced by .30)	.10	25.00
	BPS	Strategise with JJI re trial matters; email to OC re joint pre-trial; emails with OC re pre-trial matters; draft limine	.60	150.00
	JJI	24 emails re: pretrial issues (Discount: reduced by 1.60)	.80	200.00
	JJI	Continue review of Crane transcript for limine topics; draft topics and forward to Shaw	.80	200.00
	JJI	Review Littler's draft pre-trial order and notes re: same	.40	100.00
	JJI	Directive on updating net worth stipulation & latest net worth closest to trial	.30	75.00
	JJI	Review revised objections to Rave NOD, and set-up meeting	.40	100.00
	RLT	Receipt and review of Bob Page's deposition transcript; saved same to the RDG system	.20	17.00
	TMV	Prepare template Motions in Limine	.20	17.00
	TMV	2 emails with Josh and Shaw re: Limine motions (Discount: reduced by .10)	.10	8.50
06/10/2021	BPS	Continue drafting motion in limine and joint pre-trial order; TC with JJI re same; draft witness list; strategise with JJI; continue drafting pre-trial	3.50	875.00

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		materials; TC with client and JJI re trial matters; TC to Spindler; revise pretrial order; finalize draft and email to OC re same		
	JJI	Calls with Strickler re: corp. rep. NOD topics/objections & other issues	.30	75.00
	JJI	53 emails re: pre-trial activities, and jury selection expert (Discount: reduced by 3.60)	1.70	425.00
	JJI	Review and finalize limines, pre-trial order, exhibit list, numerous meetings and pre-trial actions etc.	2.80	700.00
	JJI	Confer with Dunn re: [REDACTED]	.20	50.00
	RLT	Attention to 29 e-mails with team regarding pre-trial filings and preparation of same; exhibit and witness list, depo designations, pre-trial orders and motions in limine (Discount: reduced by 2.00)	.90	76.50
	RLT	Research background information on [REDACTED] and forward report to attorney lacuone	.30	25.50
	RLT	Receipt and review of conference room waiver and consent required by Littler for deposition of Mark Schwarz; distribute same to client and court reporter and videographer	.20	17.00
	RLT	Complete conference room waiver and consent required by Littler for attorneys lacuone and Shaw (Discount: reduced by .20)		No/Chg
	RRD	7 EMs [REDACTED] (Discount: reduced by .50)	.20	50.00
	RRD	Conference w/lacuone re Speckart	.20	50.00
	TMV	Review archived file to locate settlement agreements (Discount: reduced by .10)		No/Chg
06/11/2021	BPS	Strategise with JJI re trial matters; emails to client; emails with OC; revise limine; emails to OC re damages; brief research on limine issue. TC with OC; emails with OC; revise pre-trial; emails with OC; work on pre-trial matters; revise pre-trial order with latest revisions; email to JJI re same; review and revise witness and exhibit list; emails with team; calls with paralegal re filings	3.10	775.00
	JJI	Review pre-trial order, limines, Rave limines, exhibit list, witness list, etc. and revisions/directives re: same, finalize/file/serve and 82 emails re: same, meetings w/Shaw and paralegal re: same (Discount: reduced by 3.20)	5.80	1,450.00
	RLT	Revise, finalize, convert and serve page-line designations upon opposing counsel; assemble proof of service for same	.40	34.00
	RLT	Receipt and review of Joint Motion in Limine filed by Defendant's; download same to RDG files	.20	17.00
	RLT	Receipt and review of Defendant's Motion in Limine; download same to RDG files	.20	17.00
	RLT	Receipt and review of Defendant's Exhibit List; download same to RDG files	.20	17.00
	RLT	Receipt and review of Defendant's Witness List; download same to RDG files	.20	17.00
	RLT	Convert and file Exhibit and Witness List	.20	17.00
	RLT	Convert and file Motion in Limine	.20	17.00
	RLT	Edit exhibit and Witness list for attorneys lacuone and Shaw to review (Discount: reduced by .80)		No/Chg
	RLT	Review of deposition exhibits and [REDACTED] from Scott Crane deposition	.30	25.50

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	RLT	Communications with Court Reporting service to obtain missing deposition exhibits for Scott Crane deposition (Discount: reduced by .20)	.10	8.50
	RLT	Attention to 59 e-mails with team regarding pre-trial filings and finalizing same; exhibit and witness list, depo designations, pre-trial orders and motions in limine (Discount: reduced by 4.00)	1.90	161.50
	RLT	Assemble conference room consents and waivers and forward to attorney lacuone (Discount: reduced by .20)		No/Chg
	RLT	Edit witness list (Discount: reduced by .20)		No/Chg
	RLT	Edit Motion in Limine (Discount: reduced by .20)		No/Chg
	RRD	10 EMs with Eastern District of Texas Court, opp counsel, lacuone, and Shaw re proposed order joint MTN, plaintiff's answers to defendant's interrogatories, trial witness list, exhibit list, proposed pretrial order, MTN in Limine by Crane, deposition designations of Andrea Allen, and video deposition designations of Brian Bares (Discount: reduced by .70)	.30	75.00
06/13/2021	JJI	5 emails re: depo. prep./exhibits for Schwarz depo (Discount: reduced by .30)	.20	50.00
	JJI	Confer with Dunn re: [REDACTED]	.30	75.00
	RRD	Conference w/lacuone re [REDACTED]	.30	75.00
06/14/2021	BPS	Emails with client and JJI re various trial matters; confer with JJI re Schwarz depo strategy; review docket notice; emails with paralegal re same (Discount: reduced by .40)	.50	125.00
	JJI	Pull exhibits, draft outline, prepare for Schwarz/Corp. Rep. depo.	5.90	1,475.00
	RLT	Attention to 29 e-mails with attorneys Shaw and lacuone regarding filing deficiency, Littler waiver etc (Discount: reduced by 2.10)	.80	68.00
	RLT	Convert and file revised Motion in Limine at court's request	.20	17.00
	RLT	Prepare proposed order granting plaintiff's motion in limine	.20	17.00
	RLT	Edit Littler waiver for attorney Dunn (Discount: reduced by .20)		No/Chg
	RLT	Edit Littler waiver for Client (Discount: reduced by .20)		No/Chg
	RLT	Assemble and return waivers for attorneys Shaw, lacuone, Dunn and Client, court reporter and videographer to Littler for deposition of Mark Schwarz	.20	17.00
	RLT	Confer with Court Clerk regarding motion in limine deficiency	.10	8.50
	RLT	Edit Motion in Limine (Discount: reduced by .20)		No/Chg
	RRD	1 EM with Eastern District of Texas Court re NTC of deficiency re [61] MTN in Limine by Crane (Discount: reduced by .10)		No/Chg
06/15/2021	BPS	Strategise with JJI re trial issues and Schwarz depo	.20	50.00
	JJI	Prepare for Rave corp. rep. depo./Schwarz, pull exhibits, draft outline, review other transcripts, review other exhibits, highlight all	4.40	1,100.00
	RLT	Attention to exhibits for Schwarz deposition for attorney lacuone	.40	34.00
	RLT	Attention to 17 e-mails regarding Schwarz deposition and exhibits for same, coordinate with outside vendor to produce deposition exhibits (Discount: reduced by 1.20)	.50	42.50

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	RLT	Confer with attorney lacuone regarding exhibits for Schwarz deposition	.10	8.50
06/16/2021	BPS	Review Crane production for Schwarz depo; draft counter-designations for Andrea Allen; review Rave's designations	3.10	775.00
	JJI	Continue review of file, pull exhibits, highlight exhibits, revise and continue drafting outline, etc. (Discount: reduced by 1.10)	5.70	1,425.00
	JJI	Review objections and counter-designations to deposition transcripts (Discount: reduced by .30)		No/Chg
	RLT	Receipt and review of exhibits for Schwarz deposition, label same	.40	34.00
	RLT	Attention to assembly of additional exhibits for Schwarz deposition	.30	25.50
	RLT	Attention to 24 e-mails regarding logistics of deposition, documents for deposition and several court filings (Discount: reduced by 1.70)	.70	59.50
	RRD	8 EMs with Eastern District of Texas Court, opp counsel, Phillips, and lacuone re: defendant's counter-designations and objections--Bafundo and Bares, and deposition of Schwarz (Discount: reduced by .50)	.30	75.00
06/17/2021	BPS	Emails with JJI re Allen and trial strategy; TC and emails with JJI re depo; begin drafting objection to Allen Depo; long conference with JJI re trial strategy, etc; continue drafting objection to Allen depo; research same; emails with JJI re same; finalize and email to OC re conference (Discount: reduced by .60)	1.80	450.00
	JJI	Prepare for and attend deposition of Schwarz until cert of non-appearance and travel (8-10:50) (Discount: reduced by .60)	2.20	550.00
	JJI	Call w/client re: no-show depo and next steps (9:55)	.20	50.00
	JJI	Review/feedback and approve counter-designations for Andrea	.30	75.00
	JJI	Call w/opposing counsel and new depo. date (1-1:08)	.10	25.00
	RLT	Update Amended NOD for Mark Schwarz and Rave corporate representative for June 22	.20	17.00
	RLT	Attention to seven (7) e-mails regarding amending notice of deposition for Schwarz (Discount: reduced by .70)		No/Chg
	RLT	Prepare amended deposition notice due to witness no show for today's scheduled deposition	.20	17.00
	RLT	Communications with court reporting service to reschedule deposition (Discount: reduced by .10)		No/Chg
	RLT	Update calendar with new deposition date for witness Schwarz (Discount: reduced by .10)		No/Chg
06/18/2021	BPS	TC with JJI re strategy on trial and depots; finalize and file objection to Allen depo; confer with JJI re trial matters	.90	225.00
	JJI	Multiple calls, emails etc. and filings/review further pre-trial materials, stipulations etc.	.80	200.00
	JJI	Confer with Dunn re no show at depo (Schwartz)	.30	75.00
	RLT	Attention to six (6) e-mails with team regarding pre-trial materials and trial matters (Discount: reduced by .30)	.30	25.50
	RRD	1 EM with Eastern District of Texas Court re objection to use of Allen depo at trial by Crane (Discount: reduced by .10)		No/Chg
	RRD	Conference w/lacuone re Schwartz no show at depo and strategy	.30	75.00

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06/21/2021	BPS	Emails with OC re various trial and depo matters; strategise with JJI re same; emails re pre-trial matters (Discount: reduced by .10)	.60	150.00
	JJI	43 emails re: deposition, pre-trial reqs. etc. (Discount: reduced by 2.80)	1.50	375.00
	JJI	Draft declaration for costs/fees related to canceled depo.	.30	75.00
	JJI	Continue prep. and revise outline/review exhibits again for depo.	3.70	925.00
	JJI	Draft chrono. for depo.	2.80	700.00
	RLT	Attention to 23 e-mails with team regarding deposition issues, trial matters, status and strategy (Discount: reduced by 1.60)	.70	59.50
	RRD	10 EMs with opp counsel, lacuone, Shaw, Vanderburg, court reporter and videographer, and Littler re filling out required forms for Schwarz deposition (Discount: reduced by .70)	.30	75.00
	TMV	8 emails with Josh, paralegal Thomas and Court Reporter re: deposition at Littler (Discount: reduced by .60)	.20	17.00
06/22/2021	BPS	TC and texts with JJI re Schwarz depo; TC with OC re same; coordinate with judge re hearing on discovery abuse; assist JJI on deposition issues; multiple calls with same	.80	200.00
	JJI	Prepare for and attend/travel Schwarz depo. (8:15-7:15)	11.00	2,750.00
	RLT	Attention to four (4) e-mails with team regarding depositions and trial matters (Discount: reduced by .30)	.10	8.50
06/23/2021	BPS	Review exhibit list for trial to make sure amended LTIP is exhibit in response to JJI email; email to same; conference with JJI re depo issues	.30	75.00
	JJI	21 emails re: pre-trial, trial issues, etc. (Discount: reduced by 1.50)	.60	150.00
	JJI	Conferences re: depo., follow-up issues related from testimony, trial to-do items, prepare for conference on exhibits etc./jury charge etc.	.70	175.00
	JJI	Review Cravens order on Hot line request Schwarz not answering questions and save to file/forward to client	.10	25.00
	JJI	Review file for amended 2017 LTIP docs showing same; update chrono. to reflect same	.50	125.00
	JJI	Confer with Dunn re: Schwartz deposition	.30	75.00
	RLT	Receipt and review of Order from the Court regarding discovery hot line matter related to deposition testimony of Mark Schwarz; download same to RDG system and distribute same to team (Discount: reduced by .20)	.10	8.50
	RLT	Attention to four (4) e-mails with team regarding trial matters, deposition, strategy and status (Discount: reduced by .20)	.20	17.00
	RRD	1 EM with Eastern District of Texas Court re: order re discovery hot line hrg (Discount: reduced by .10)		No/Chg
	RRD	Conference w/lacuone re download on Schwartz depo	.30	75.00
06/24/2021	BPS	Review proposed jury charge; conference with JJI re same; email to OC; confer with JJI re strategy; docket entry from court; draft joint motion to suspend trial deadline; emails with OC; confer with JJI; finalize joint motion and file same via ECF (Discount: reduced by .80)	2.70	675.00

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	JJI	23 emails re: time to confer on pretrial materials (Discount: reduced by 1.60)	.70	175.00
	JJI	Review Littler proposed Jury Charge and feedback	1.10	275.00
	JJI	Review Court order re: pre-trial and new trial date; conference with o/c and Shaw re: same; forward to client	.30	75.00
	JJI	Review research on [REDACTED]	.20	50.00
	JJI	Review and approve joint motion extend dates for pre-trial	.20	50.00
	RLT	Receipt and review of electronic order regarding pre-trial conference; download same to RDG system, circulate same	.20	17.00
	RLT	Update calendar with logistics with electronic docket order regarding pre-trial conference	.20	17.00
	RLT	Receipt and review of electronic docket order canceling pre-trial conference and scheduling hearing on trial setting set by the Court	.20	17.00
	RLT	Update calendar with new hearing conference ordered by the Court (Discount: reduced by .10)		No/Chg
	RLT	Attention to seven (7) e-mails with team regarding deadlines, outstanding items, and trial materials (Discount: reduced by .50)	.20	17.00
	RRD	2 EMs with Eastern District of Texas Court re: conference to discuss trial scheduling, final pretrial conference cancelled, terminate MTNs, set scheduling order deadlines, and NTC of hearing by Crane (Discount: reduced by .20)		No/Chg
06/25/2021	BPS	TC to court re order on resetting DL; email to OC re same	.30	75.00
	JJI	Review file and update to jury expert on likely trial dates	.10	25.00
	JJI	Update TDL	.10	25.00
	JJI	10 emails re: various pre-trial activities/trial date etc. (Discount: reduced by .70)	.30	75.00
	RRD	1 EM with Iacuone, Shaw, Dobbs, and Speckart re update on trial dates (Discount: reduced by .10)		No/Chg
06/26/2021	JJI	Email with Dunn, Iacuone, Client and Speckart re update on trial	.10	25.00
	RRD	1 EM with Speckart, Iacuone, Shaw, and Dobbs re trial schedule update (Discount: reduced by .10)		No/Chg
06/27/2021	JJI	Review comm. & transcript for Schwarz and forward to team and 4 emails re: same (Discount: reduced by .20)	.50	125.00
	RLT	Attention to five (5) e-mails with team regarding deposition transcripts and deadlines (Discount: reduced by .30)	.20	17.00
06/28/2021	BPS	Order from court on pre-trial deadline; emails with OC and JJI re trial prep matters (Discount: reduced by .30)		No/Chg
	JJI	8 emails re: extensions & w/opposing counsel re: exhibits (Discount: reduced by .50)	.30	75.00
	JJI	Briefly review rough of Schwarz depo.	.50	125.00
	JJI	Review Court order extending pretrial deadlines & directive to reset	.20	50.00
	RLT	Attention to ten (10) e-mails with team regarding Court Order to extend	.50	42.50

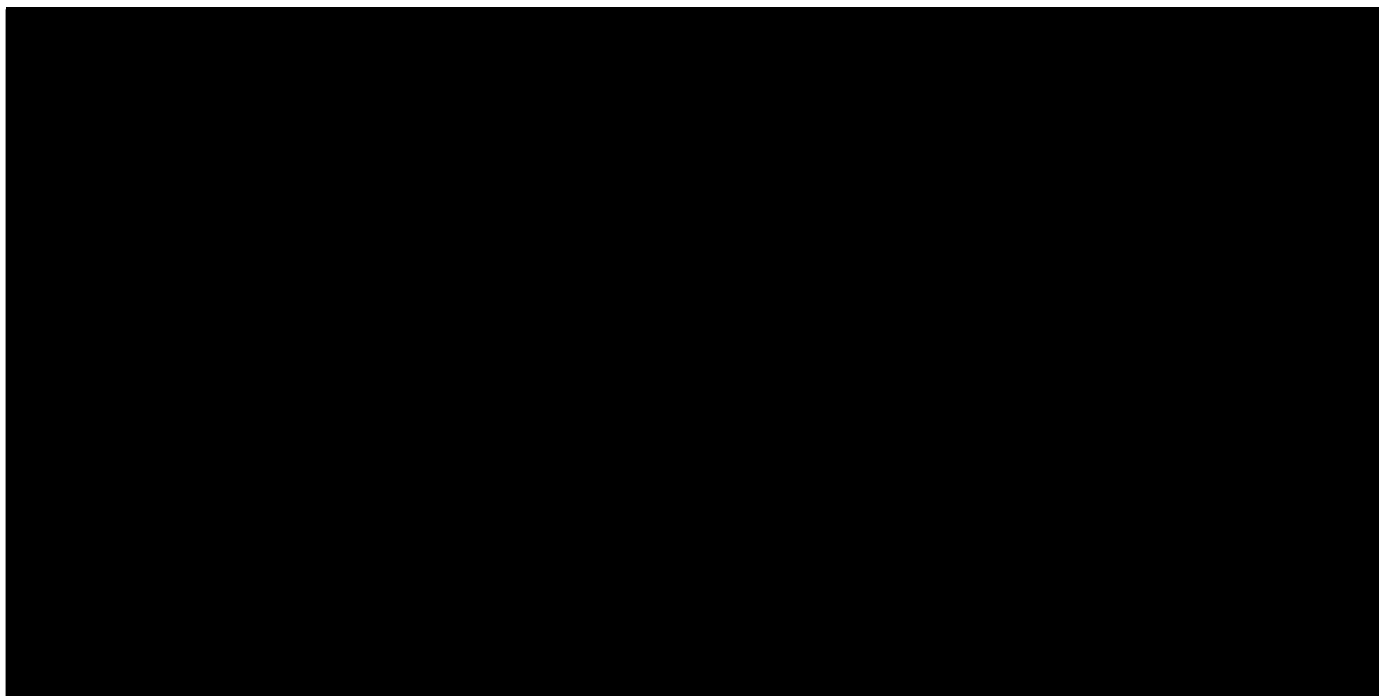
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23-5518

		deadlines, status and strategy for same (Discount: reduced by .50)		
	RRD	1 EM with Eastern District of Texas Court re joint MTN to reset or suspend current trial related DL (Discount: reduced by .10)		No/Chg
06/29/2021	JJI	2 emails re: exhibits (Discount: reduced by .10)	.10	25.00
	RLT	Attention to two (2) e-mails with attorney Iacuone and opposing counsel regarding exhibit list (Discount: reduced by .10)	.10	8.50
06/30/2021	JJI	Brief review exhibits for Schwarz depo. (Discount: reduced by .20)		No/Chg
	RLT	Attention to four (4) e-mails with court reporting service regarding status of deposition transcripts (Discount: reduced by .30)	.10	8.50
TOTAL FOR CURRENT SERVICES RENDERED			109.40	24,891.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	2.20	\$250.00	\$550.00
Joshua J. Iacuone	65.80	250.00	16,450.00
Anna Richardson	2.90	250.00	725.00
Brian P. Shaw	23.60	250.00	5,900.00
Rhonda L Thomas	14.40	85.00	1,224.00
Tina M. Vanderburg	0.50	85.00	42.50

Statement No: 08/03/2021
23-5518





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

08/08/2021

Statement No: 24-5569

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
07/01/2021	BPS	TC with Client and lacuone regarding attorney McAllister substituting for me (Discount: reduced by .40)		No/Chg
	BPS	5 emails with Team (Discount: reduced by .50)		No/Chg
	JJI	9 emails re: pre-trial issues, trial date hearing with Judge Mazzant, exhibits for joint and separate list (Discount: reduced by .60)	.30	75.00
	JJI	Review calendars and prepare for and attend hearing on new trial dates	.80	200.00
	JJI	Review court notes/ECF and forward to client/expert	.20	50.00
	JJI	Calls with Shaw & Scott re: Greg M. substituting for Shaw etc. & meeting with Greg M.	.40	100.00
	RLT	Attention to five (5) emails with attorney lacuone and Shaw regarding new trial date and deadlines for same (Discount: reduced by .30)	.20	17.00
	RLT	Receipt and review of minute order from the Court regarding new trial setting; download and save same to the system	.20	17.00
	RLT	Receipt and review of Order setting pre-trial hearing; download same and save to the system	.20	17.00
	RLT	Update calendar with new trial setting and trial deadlines (x3) and "tickler" email reminders	.60	51.00
	RRD	2 EMs with Eastern District of Texas Court re: minute entry for proceedings held before Judge Mazzant, final pretrial conf set, and jury selection/trial set (Discount: reduced by .10)	.10	25.00

Statement No: 08/08/2021
24-5569

07/02/2021	BPS	2 emails with Team and Client (Discount: reduced by .20)		No/Chg
	JJI	2 emails re: pleadings and trial date (Discount: reduced by .10)	.10	25.00
	RRD	2 EMs with Iacuone, Speckart, Shaw, and Dobbs re updated trial date, payment terms, and latest complaint/pleadings (Discount: reduced by .10)	.10	25.00
07/06/2021	JJI	4 emails re: depo. certifications etc. (Discount: reduced by .20)	.20	50.00
07/12/2021	BPS	Confer with Team regarding trial	.20	50.00
	GPM	Confer with Iacuone and Shaw regarding trial dates	.20	50.00
	JJI	Ensure all deadlines correct/calendered as keyed-off of new trial date	.30	75.00
	JJI	Conferences with Shaw and Greg re: trial dates etc.	.20	50.00
	JJI	2 emails re: various certifications (Discount: reduced by .10)	.10	25.00
07/13/2021	JJI	3 emails re: reimbursement of costs & fees for non-appearance by Schwarz (Discount: reduced by .20)	.10	25.00
07/19/2021	GPM	Analyze discovery responses.	1.30	325.00
	GPM	Confer with Dunn regarding trial and discovery	.30	75.00
	RRD	Conference w/McAllister re discovery response and trial strategy	.30	75.00
07/21/2021	GPM	Meet with Iacuone.	.20	50.00
	GPM	Analysis re Court docket.	.80	200.00
	GPM	5 emails with opposing counsel. (Discount: reduced by .30)	.20	50.00
	JJI	3 emails re: non-appearance and invoice (Discount: reduced by .20)	.10	25.00
	JJI	Conference with McAllister re: non-appearance, discovery and strategy	.20	50.00
07/24/2021	GPM	Analysis and notes re Defendant's summary judgment arguments, motions in limine, witness list, exhibit list, and pre-trial order.	2.90	725.00
07/25/2021	GPM	Analysis and notes re A. Allen deposition.	1.40	350.00
07/28/2021	GPM	Analysis and notes re depositions of Crane and Schwartz and emails with Iacuone (Discount: reduced by .20)	3.60	900.00
	JJI	3 emails re: Greg Mc. Review of file/strategy for trial issues (Discount: reduced by .20)	.10	25.00
07/30/2021	GPM	Analysis and notes re depositions of Bafundo, Bares, and Page.	4.30	1,075.00

Statement No: 08/08/2021
24-5569

TOTAL FOR CURRENT SERVICES RENDERED**20.20****4,852.00**RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.50	\$250.00	\$125.00
Joshua J. Iacuone	3.10	250.00	775.00
Greg McAllister	15.20	250.00	3,800.00
Brian P. Shaw	0.20	250.00	50.00
Rhonda L Thomas	1.20	85.00	102.00



500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

09/21/2021

Statement No: 25-5704

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
08/04/2021	BPS	Review memorandum opinion on MSJ; confer with JJI re same; TC with client and JJI re same and strategy on settlement (Discount: reduced by .30)	.50	125.00
	GPM	Analyze summary judgment order.	.70	175.00
	JJI	Review MSJ order; analysis and meeting w/Shaw re: same; call client and forward opinion to client	.80	200.00
	RLT	Receipt and review of court's ruling on MSJ; download same to RDG system and distribute to team (Discount: reduced by .20)		No/Chg
	RRD	Email with paralegal, team and court notification re: Order entered (Discount: reduced by .10)	.10	25.00
08/05/2021	GPM	Meet with Iacuone re order and status.	.40	100.00
	JJI	6 emails w/counsel re: status of \$500 paying CSI for non-appearance costs (Discount: reduced by .30)	.30	75.00
	JJI	Confer with McAllister re Order status	.20	50.00
08/06/2021	GPM	Emails with JJI re expert; email to Spindler re same (Discount: reduced by .10)	.10	25.00
	JJI	4 emails re: Schwarz transcript & Spindler review for expert opinions etc. (Discount: reduced by .20)	.20	50.00

Statement No: 09/21/2021
25-5704

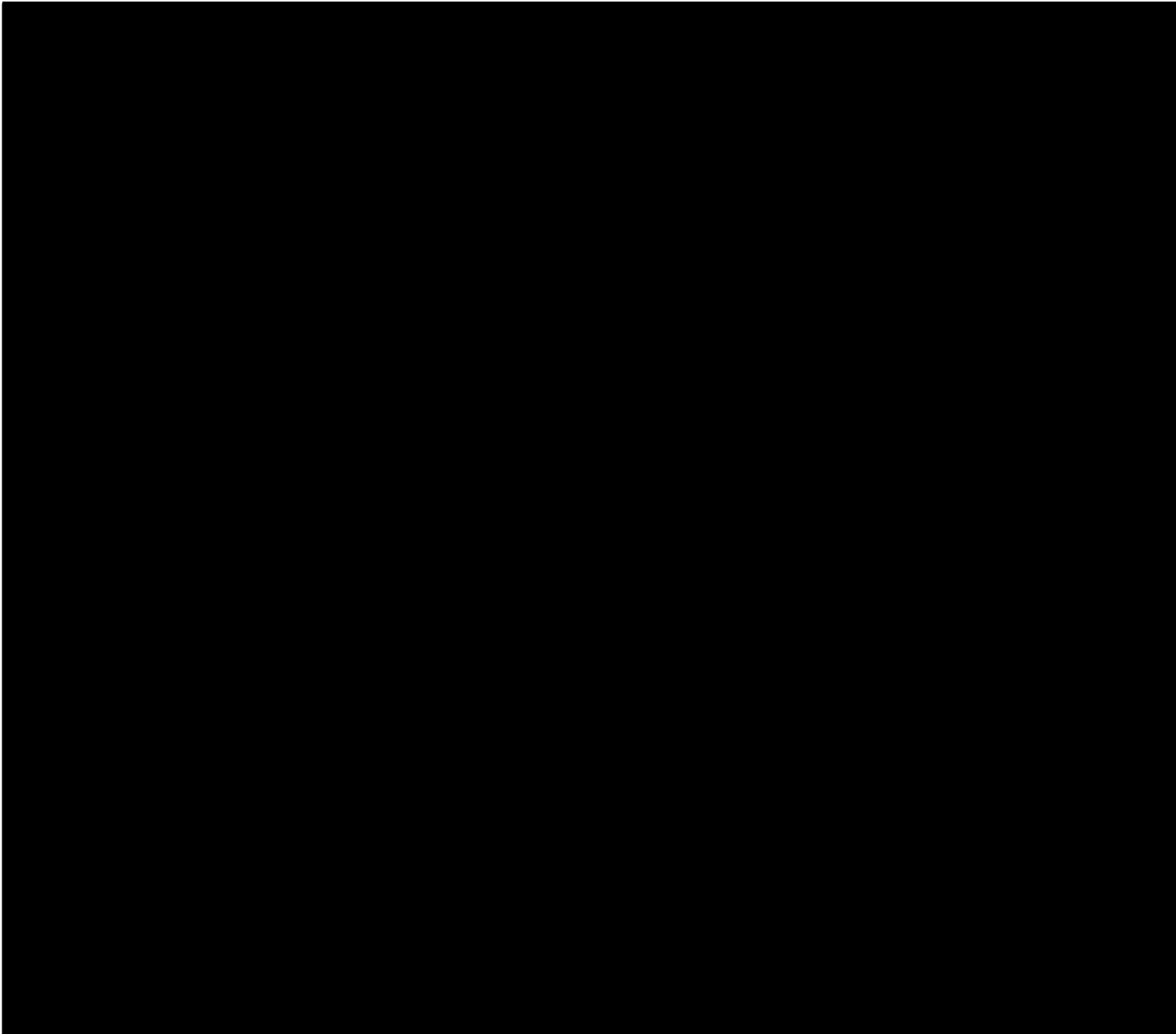
08/11/2021	GPM	Analysis re pre-trial pleadings.	.30	75.00
	GPM	Meeting with lacuone	.20	50.00
	JJI	Conference/strategy w/McAllister to broach settlement w/Rave after rulings	.20	50.00
08/16/2021	JJI	Conversations and strategy to reach out to Jamie/feel-out mediation/settlement	.20	50.00
08/17/2021	GPM	Meeting with lacuone.	.10	25.00
	JJI	Confer with McAllister re re-addressing severance at pre-trial hearing	.10	25.00
08/23/2021	JJI	Review Littler check for \$500 and forward to client w/comment	.10	25.00
08/25/2021	GPM	4 emails with opposing counsel. (Discount: reduced by .20)	.20	50.00
	JJI	17 emails w/Jamie to confer on supplemental Jt Pretrial given MSJ order (Discount: reduced by 1.20)	.50	125.00
	JJI	Confer with Dunn re: settlement	.10	25.00
	RRD	Conference with JJI re settlement strategy (Discount: reduced by .10)		No/Chg
08/26/2021	JJI	3 emails re: meeting for pre-trial supplement (Discount: reduced by .20)	.10	25.00
08/27/2021	JJI	Review additional depo. changes/erratas	.10	25.00
08/30/2021	JJI	2 emails with paralegal re: errata sheets (Discount: reduced by .10)	.10	25.00
	RLT	Attention to two (2) e-mails with attorney lacuone regarding executed errata sheets from depositions (Discount: reduced by .10)	.10	8.50
	RLT	Receipt and review of witness Bares executed errata sheet; download same to the RDG system	.20	17.00
	RLT	Receipt and review of witness Page executed errata sheet; download same to the RDG system	.20	17.00
08/31/2021	GPM	Prepare for call with opposing counsel.	.20	50.00
	GPM	Call with opposing counsel.	.30	75.00
	GPM	Confer with lacuone	.30	75.00
	JJI	Prepare for call with o/c re: pretrial issues	.20	50.00
	JJI	Attend call with o/c re: pretrial issues & contractual severance issues (1:30-1:47)	.30	75.00
	JJI	Meeting with McAllister to decide strategy/next steps re: contractual severance issues (1:47-2:10)	.30	75.00

Statement No: 09/21/2021
25-5704

TOTAL FOR CURRENT SERVICES RENDERED	7.70	1,842.50
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.10	\$250.00	\$25.00
Joshua J. Iacuone	3.80	250.00	950.00
Greg McAllister	2.80	250.00	700.00
Brian P. Shaw	0.50	250.00	125.00
Rhonda L Thomas	0.50	85.00	42.50



Statement No: 09/21/2021
25-5704





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TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

11/01/2021

Statement No: 26-5848

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	No/Chg
09/01/2021	GPM	Email to paralegal. (Discount: reduced by .10)		No/Chg
	RLT	Attention to one (1) e-mails with attorney McAllister regarding motion to withdraw attorney Shaw and enter appearance for attorney McAllister (Discount: reduced by .10)		No/Chg
09/02/2021	GPM	5 emails with lacuone and Client. (Discount: reduced by .30)	.20	50.00
	JJI	Call court re: amended jt. Pretrial order and specifics/mechanics for same - meeting and feedback on strategy	.20	50.00
	JJI	Call with jury selection specialist re: trial issues	.10	25.00
	JJI	Review proposal for jury selection contract w/CSI; make changes/suggestions - forward to client and team; 6 emails re: same	.50	125.00
	JJI	Confer with Dunn re: jury selection	.20	50.00
	RLT	Attention to two (2) e-mails with team regarding motion to withdraw attorney Shaw and enter appearance for attorney McAllister (Discount: reduced by .10)	.10	8.50
	RLT	Draft motion to withdraw attorney Shaw and notice of appearance for attorney McAllister and forward to attorney McAllister for review	.30	25.50
	RRD	Conference w/lacuone re jury selection strategy	.20	50.00
09/03/2021	GPM	19 emails with opposing counsel, lacuone, and paralegal. (Discount: reduced by 1.40)	.50	125.00

Crane/Lawsuit

Confidential

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Statement No: 11/01/2021
26-5848

	JJI	Review and circulate to all counsel re: no need for leave motion for am. Final pretrial order	.20	50.00
	JJI	Review and execute withdrawal/substitution Shaw for McAllister; and execute directive for CSI/jury selection	.20	50.00
	JJI	22 emails re: jury expert and trial issues (Discount: reduced by 1.40)	.80	200.00
	RLT	Attention to 22 e-mails with team regarding motion to withdraw attorney Shaw and notice of appearance for attorney McAllister (Discount: reduced by 1.40)	.80	68.00
	RLT	Convert and file notice of withdraw and proposed order for attorney Shaw (Discount: reduced by .20)		No/Chg
	RLT	Convert and file notice of appearance for attorney McAllister	.20	17.00
	RLT	Receipt and review of file-marked documents; downloaded to RDG system	.20	17.00
	RRD	Receipt and review court notifications and email with team (Discount: reduced by .20)	.10	25.00
09/06/2021	GPM	Email with opposing counsel (Discount: reduced by .10)		No/Chg
	JJI	Email to all counsel re: Am. Pretrial order given MSJ rulings (Discount: reduced by .10)		No/Chg
09/07/2021	GPM	7 emails with lacuone and opposing counsel. (Discount: reduced by .40)	.30	75.00
	JJI	Review executed contract for jury selection/send and directive to CSI re: next steps	.10	25.00
	JJI	7 emails re: new Am. Joint Pre-Trial Order given MSJ rulings and first draft (Discount: reduced by .40)	.30	75.00
	JJI	Review Court's order re: substitution of counsel (Discount: reduced by .10)		No/Chg
	RLT	Attention to two (2) e-mails with team regarding court filings (Discount: reduced by .20)		No/Chg
	RRD	Receipt and review Court notification and email with lacuone and Speckart re: order granting motion to withdraw and CSI contract for trial assistance (Discount: reduced by .20)		No/Chg
09/08/2021	GPM	Email with expert.	.20	50.00
	JJI	Compile and circulate fully executed K for jury selection etc.	.20	50.00
	JJI	5 emails w/client and jury expert re: background facts (Discount: reduced by .30)	.20	50.00
	JJI	Update and revise Jt. Pretrial as Amended to account for MSJ order and revisit severance w/jury charge to preserve for appeal (Discount: reduced by .30)	1.50	375.00
09/09/2021	GPM	3 emails with expert and lacuone. (Discount: reduced by .30)		No/Chg
	JJI	Review further materials	.20	50.00
	JJI	4 emails re: jury expert (Discount: reduced by .20)	.20	50.00
	JJI	Meet re: expert	.20	50.00
	RLT	Attention to forwarding pleadings to jury consultant for review		No/Chg

Statement No: 11/01/2021
26-5848

		(Discount: reduced by .10)		
	RLT	Confer with attorney lacuone regarding expert	.20	17.00
09/10/2021	GPM	Analyze Orders to draft revisions to Amended Pretrial Order. (Discount: reduced by .40)	.70	175.00
	JJI	Comms with expert re: trial particulars and scheduling	.20	50.00
	JJI	Review further certification for Schwarz (Discount: reduced by .10)		No/Chg
	JJI	Review GPM changes to am. Jt pretrial, accept some, finalize and send to other side	.30	75.00
	RLT	Receipt and review of Schwarz transcript; download same to the RDG system	.20	17.00
09/16/2021	GPM	5 emails with lacuone and opposing counsel. (Discount: reduced by .30)	.20	50.00
	JJI	5 emails re: Rave feedback on Am. Jt Pretrial & meeting with McAllister (Discount: reduced by .30)	.20	50.00
	RLT	Attention to five (5) e-mails with team and opposing counsel regarding amending the joint scheduling order (Discount: reduced by .30)	.20	17.00
09/17/2021	JJI	Call w/expert re: trial prep./particulars/pre-trial hearing	.10	25.00
	RLT	Attention to one (1) e-mail from expert regarding scheduling (Discount: reduced by .10)		No/Chg
09/19/2021	GPM	Analysis and notes for trial preparation.	1.40	350.00
09/20/2021	GPM	Analyze trial information from Court.	.30	75.00
	JJI	7 emails re: trial prep./strategy & with court (Discount: reduced by .40)	.30	75.00
09/21/2021	JJI	2 emails re: trial and exhibits (Discount: reduced by .10)	.10	25.00
09/22/2021	GPM	Analysis and notes re witnesses, voir dire, potential trial themes, closing, and experts.	4.20	1,050.00
	GPM	16 emails with lacuone and paralegal. (Discount: reduced by .90)	.70	175.00
	GPM	Confer with lacuone	.20	50.00
	JJI	Meeting with GPM re: trial prep.	.20	50.00
	JJI	16 emails re: trial prep (Discount: reduced by .90)	.70	175.00
	RLT	Attention to eight (8) e-mails with team regarding logistics of meeting to discuss trial efforts (Discount: reduced by .50)	.30	25.50
09/24/2021	CMM	3 emails with McAllister and lacuone regarding research on [REDACTED] (Discount: reduced by .20)	.10	25.00
	GPM	Prepare for trial meeting.	.20	50.00
	GPM	Meeting with lacuone and Thomas (51 mins)	.80	200.00

Statement No: 11/01/2021
26-5848

	GPM	7 emails with lacuone, vendor, paralegal. (Discount: reduced by .40)	.30	75.00
	JJI	14 emails re: various pre-trial activities, including research, to trial director etc. (Discount: reduced by .90)	.50	125.00
	JJI	Meeting w/trial team re: TDL and action items (10-10:52)	.80	200.00
	RLT	Attention to 11 e-mails with team regarding trial action plan, outstanding items, strategy, assignments and update (Discount: reduced by .70)	.40	34.00
	RLT	Meeting with trial team regarding action list, outstanding items and assignments	.80	68.00
	RLT	Attention to updating action list	.30	25.50
09/25/2021	GPM	2 emails from lacuone. (Discount: reduced by .10)	.10	25.00
	GPM	Notes re direct examination.	1.40	350.00
	JJI	2 emails re: trial prep (Discount: reduced by .10)	.10	25.00
	RLT	Attention to two (2) e-mails with team and trial director regarding formal agreement for trial (Discount: reduced by .10)	.10	8.50
09/27/2021	GPM	Analysis re trial exhibits.	.20	50.00
	JJI	Review Faulk proposed agreement/thoughts and 21 emails re: same & set-up call	.60	150.00
09/28/2021	GPM	Voicemail to opposing counsel. (Discount: reduced by .10)		No/Chg
	JJI	14 emails re: hotel etc. for trial (Discount: reduced by .90)	.50	125.00
	RLT	Attention to 12 e-mails with team regarding trial action plan, outstanding items, strategy, assignments and update s (Discount: reduced by .80)	.40	34.00
09/29/2021	AOR	Begin review and analysis of the federal rules and related case law regarding the requirements [REDACTED]	1.80	450.00
	AOR	3 emails with lacuone and McAllister regarding [REDACTED] (Discount: reduced by .20)	.10	25.00
	GPM	Call with opposing counsel (5 mins)	.10	25.00
	GPM	17 emails with co-counsel, vendor, and Client. (Discount: reduced by 1.00)	.70	175.00
	GPM	Analyze Plaintiff's Motions in Limine to draft outline for response. (Discount: reduced by 1.00)	2.10	525.00
	JJI	21 emails re: pretrial actions and circulate executed trial director contract and meeting with jury expert set-up (Discount: reduced by 1.40)	.70	175.00
	JJI	Update trial action item list re: jury consultant and themes etc.	.20	50.00
	JJI	Revise jury charge draft and changes; compare to MSJ order	2.40	600.00
	JJI	Meet re: testimony of Ronnie Parker	.30	75.00
	RLT	Attention to 14 e-mails with team regarding trial action plan, outstanding items, strategy, assignments and update (Discount: reduced by .90)	.50	42.50
	RRD	Conference w/lacuone re [REDACTED]	.30	75.00

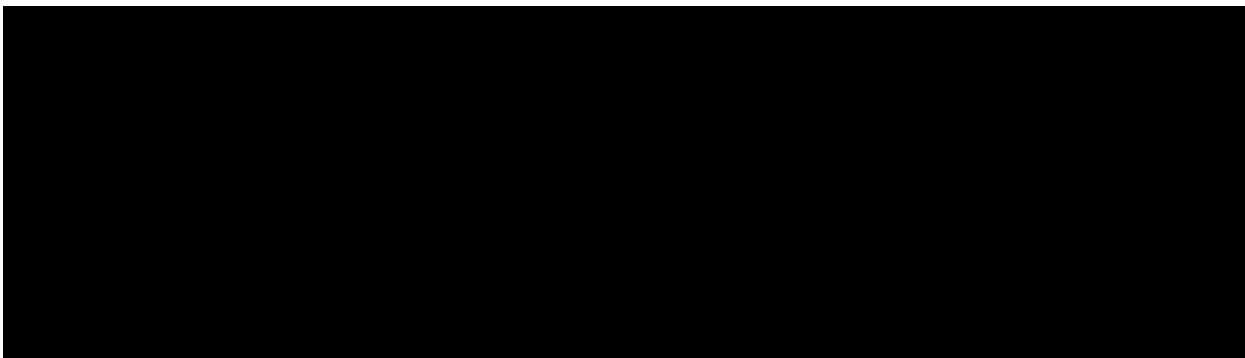
Statement No: 11/01/2021
26-5848

09/30/2021	CMM	Research regarding election of remedies	1.60	400.00
	GPM	Analysis and notes re witness lists, court orders, disclosures, and discovery.	2.80	700.00
	GPM	Call with Client and Iacuone and then meet with Iacuone.	1.10	275.00
	GPM	Analyze pleadings, orders, and disclosures re documents to bring to court, war room, hearing.	1.30	325.00
	GPM	Additional analysis and draft Response to each of five motions in limine filed by Defendant.	4.80	1,200.00
	JJI	Review court website re: trial specific issues & procedures, speak with court clerk; detailed analysis of info. from court clerk and issues with jury selection/agenda for meeting with jury expert; update various TDL items; research re: court procedures and jury charge/pattern for 5th Cir. and TPJC, update	3.10	775.00
	JJI	Call with Crane and meeting after w/McAllister to discuss various action items	1.10	275.00
	RLT	Attention to logistics of scheduling trial prep meeting with client and trial prep meeting with jury consultant	.20	17.00
	RLT	Attention to logistics of trial and lodging for trial team	.50	42.50
	RRD	Email with court staff and team re: pre-trial requirements, court presentation aids, and trial exhibit submissions (Discount: reduced by .10)		No/Chg

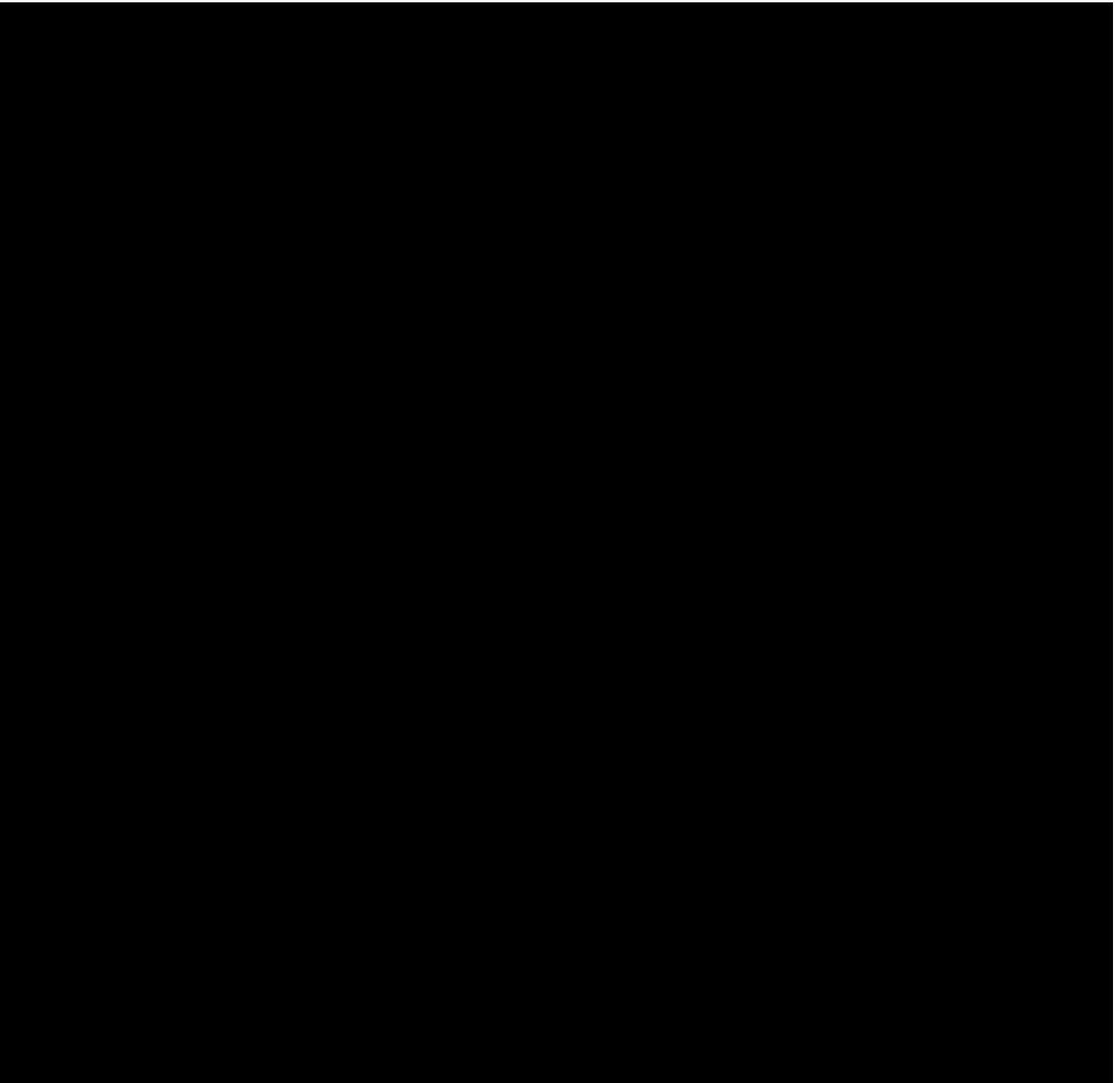
TOTAL FOR CURRENT SERVICES RENDERED	52.20	12,109.50
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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	0.60	\$250.00	\$150.00
Joshua J. Iacuone	17.50	250.00	4,375.00
Greg McAllister	24.80	250.00	6,200.00
Cori McComber	1.70	250.00	425.00
Anna Richardson	1.90	250.00	475.00
Rhonda L Thomas	5.70	85.00	484.50



Statement No: 11/01/2021
26-5848





500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

STATEMENT FOR LEGAL SERVICES
Tax ID Number - 35-2615124

CONFIDENTIAL: ATTORNEY WORK PRODUCT ATTORNEY/CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

11/09/2021

Statement No: 27-5897

Matter ID: 7495-002

Your case name: Crane/Lawsuit

Description of Legal Services

			Hours	
10/01/2021	AOR	Continue review and analysis of the federal rules and related case law regarding the requirements to [REDACTED]	1.70	425.00
	AOR	Conference with lacuone regarding research findings	.10	25.00
	CMM	5 emails with attorney team regarding research and trial (Discount: reduced by .30)	.20	50.00
	GPM	Meet with lacuone re trial strategy.	.30	75.00
	GPM	29 emails with lacuone, paralegal, opposing counsel. (Discount: reduced by 2.00)	.90	225.00
	GPM	Notes and analysis for opening statement.	2.30	575.00
	JJI	Review file and notes on subpoenas	.20	50.00
	JJI	32 emails re: Speckhart meeting and to trial prep (Discount: reduced by 2.20)	1.00	250.00
	JJI	Add TDL items for subpoenas to Rave and pick jury/closing issues; set-up w/jury consultant; set-up w/trial director; review various research; directives etc.	2.10	525.00
	JJI	Call with Hellberg re: [REDACTED]	.30	75.00
	RLT	Attention to 31 e-mails with attorneys McAllister and lacuone and team regarding status and strategy (Discount: reduced by 2.10)	1.00	85.00
	RLT	Attention to logistics of trial, jury consultant, trial tech, updating action list, subpoenas etc	1.80	153.00

11/09/2021
27-5897

Statement No:

10/02/2021	GPM	Notes for arguments re exhibits and deposition designations.	1.40	350.00
10/03/2021	RLT	Attention to three (3) e-mails with attorneys McAllister and lacuone and team regarding additional trial preparation materials (Discount: reduced by .20)	.10	8.50
	RLT	Attention to travel and hotel arrangements for trial team; research hotels in Sherman, Texas and contact same for availability	.80	68.00
10/04/2021	GPM	Analyze lacuone revisions to response to motions in limine.	.10	25.00
	GPM	Draft additional revisions to response to motions in limine.	.10	25.00
	GPM	18 emails with lacuone and paralegal. (Discount: reduced by 1.20)	.60	150.00
	GPM	Draft revisions for pretrial filings and draft revisions to trial action list.	1.70	425.00
	JJI	Review our draft Response to MIL and changes & forward to client	.20	50.00
	JJI	Pretrial action items including revise response to MIL, continue drafting jury charge, new action items including docket sheet specifics, review Rave answer re: aff. defenses; review PJC; review Fifth Circuit pattern jury; various calls and meetings w/trial team and client	3.30	825.00
	JJI	20 emails re: trial, action items, travel plans, etc. (Discount: reduced by 1.40)	.60	150.00
	JJI	Review client travel for Wed direct testimony prep. and add to calendar	.10	25.00
	RLT	Attention to 17 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 1.20)	.50	42.50
	RLT	Update docket sheet to include contact information for trial team including trial tech, experts, jury consultant etc	.50	42.50
	RLT	Attention to pre-trial action items, logistics of trial and trial notebooks	3.20	272.00
10/05/2021	GPM	Analyze and draft revisions to jury charge.	1.80	450.00
	GPM	Prepare for call with jury consultant.	.20	50.00
	GPM	Call with jury consultant and lacuone. (51 mins)	.90	225.00
	GPM	Meet with lacuone.	.10	25.00
	JJI	11 emails re: pretrial activities (Discount: reduced by .70)	.40	100.00
	JJI	Start review and cross-x of Schwarz depo. in preparation of testimony	3.10	775.00
	JJI	Review Schwarz depo., and add all new exhibits from that depo., add depo. cross references to exhibit list, revise and finalize supplemental ex. List	2.70	675.00
	JJI	Prepare for meeting w/jury consultant/themes/strategies	.30	75.00
	JJI	Meeting with Greg and Speckhart re: themes/jury selection (51:22)	.80	200.00
	RLT	Attention to 26 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 1.90)	.70	59.50
	RLT	Update exhibit list for attorney review	.80	68.00
	RLT	Began to assemble trial box with materials for trial	.50	42.50

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	RLT	Review and assemble of depositions, deposition exhibits and preparation of trial notebooks	2.20	187.00
	RRD	Receipt and review court notification re: filing of Supplemental Exhibit and Witness List (Discount: reduced by .10)		No/Chg
10/06/2021	CMM	2 emails with attorney team regarding research on evidence admissibility (Discount: reduced by .10)	.10	25.00
	GPM	Prepare for call with opposing counsel.	.60	150.00
	GPM	Call with opposing counsel (40 mins)	.70	175.00
	GPM	Call with lacuone re conference with opposing counsel.	.30	75.00
	GPM	26 emails with lacuone, paralegal, opposing counsel, and Court. (Discount: reduced by 1.90)	.70	175.00
	JJI	26 emails re: trial, TDLs, meeting with all counsel etc. (Discount: reduced by 1.90)	.70	175.00
	JJI	Note re: direct and fraudulent inducement damages	.40	100.00
	JJI	Review Rave's counter-designations and draft objections to same for Bafundo and Page	1.20	300.00
	JJI	Continue boxing Schwarz 300+ page depo. transcript	1.20	300.00
	JJI	Review McAllister changes to jury charge and further revise	.70	175.00
	JJI	Call with o/c re: pretrial issues/stipulations etc. (40:00)	.70	175.00
	JJI	Review Ronnie Parker transcript for Mark Schwarz	1.80	450.00
	RLT	Attention to eight (8) e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by .50)	.30	25.50
	RLT	Revise, finalize, convert and file Plaintiff's supplemental exhibit list; saved same to system and distribute same to team	.40	34.00
	RLT	Attention to action plan from attorney McAllister and begin preparation for same, review file material and began organizing trial notebooks	.80	68.00
	RLT	Review and assemble of discovery and preparation of trial notebooks	1.40	119.00
10/07/2021	AOR	Review and analysis of Rave's most recent form 10-K and form 10-Q to determine net worth	.20	50.00
	AOR	Revise the joint stipulation of net worth in light of Rave's new net worth	.20	50.00
	AOR	6 emails with lacuone and McAllister regarding the revised joint stipulation of dismissal (Discount: reduced by .30)	.30	75.00
	CMM	Research regarding [REDACTED]	1.70	425.00
	GPM	Meet with lacuone re exhibits and jury charge.	.40	100.00
	GPM	Analyze Defendant's exhibits and draft objections to exhibits.	3.00	750.00
	GPM	38 emails with Client, lacuone, paralegal, opposing counsel. (Discount: reduced by 2.60)	1.20	300.00
	JJI	39 emails re: pretrial materials, and trial to-do items including limine, jury charge, exhibit list objs, objs to video depositions, etc (Discount: reduced by 2.80)	1.10	275.00
	JJI	Review stipulations, objections to cross-designations, objections to Bares designations, finalize and draft P's Jury Charge; exhibit objections, work on cross-x, meetings with team, review file for	4.80	1,200.00

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agreements, add and revise TDL items; short call with expert; update and review re: stip on net worth; short call w/expert on details/particulars for trial; research [REDACTED] damages; review updated net worth stip and forward to o/c w/comments; review just produced supplemental docs from Rave and analyze

	RLT	Attention to 41 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 3.00)	1.10	93.50
	RLT	Review and assemble of defendant's exhibits, plaintiff's exhibits and various motions and orders for trial binders	2.60	221.00
	RLT	Communications and uploading files to vendor for printing of four sets of trial binders	.80	68.00
10/08/2021	CMM	2 emails with attorney team regarding research findings on evidence admissibility (Discount: reduced by .10)	.10	25.00
	GPM	Meet with lacuone re pre-trial filings.	.30	75.00
	GPM	Analysis re impeachment.	.20	50.00
	GPM	Draft revisions to objections to exhibits, objections to designations of Bafundo, objections to counter-designations, objections to Bares designation, and jury charge.	4.40	1,100.00
	GPM	Analyze new filings by Plaintiff re response to motion in limine, exhibit list, witness list.	1.40	350.00
	GPM	60+ emails with Court, Client, lacuone, paralegal, opposing counsel. (Discount: reduced by 4.80)	1.30	325.00
	JJI	69 emails re: pretrial activities & pretrial filings etc. (Discount: reduced by 5.00)	1.90	475.00
	JJI	Various deadline and pretrial action items, jury charge merging as one document issues, exhibit list objections, binders, finalize/revise various deadline filings; meetings with team; e-sign and file stipulation re: net worth; review multiple filings by Rave re: objections, supplemental lists, limines etc.	5.40	1,350.00
	JJI	Review various research briefs and have filed for trial binders	.20	50.00
	RLT	Attention to 50 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 3.90)	1.10	93.50
	RLT	Revise, finalize, convert and file Joint Stipulation regarding Rave's Net Worth; save to system and distribute same	.40	34.00
	RLT	Attention to finalizing various pre-trial documents for filing	.80	68.00
	RLT	Confer with attorney McAllister regarding trial binders	.30	25.50
	RLT	Attention to trial binders	1.10	93.50
	RRD	Receipt and review numerous court notifications re: pre-trial filings (Discount: reduced by .80)	.40	100.00
	TMV	18 emails with team, Client and court notifications re: pre-trial filings (Discount: reduced by 1.30)	.50	42.50
	TMV	Receipt and review of Court communication, login to Court website, distribute to team, review, organize and analyze e-filed Proposed Jury Instructions filed by Rave	.20	17.00
	TMV	Review, finalize, format, convert and e-file response in opposition to Motion in Limine	.40	34.00
	TMV	Review, finalize, format, convert and e-file NOTICE by Scott Crane of	.30	25.50

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		Plaintiff's Objections to Defendant's Counter-Designations and Objections of Deposition of Bob Bafundo		
	TMV	Review, finalize, format, convert and e-file NOTICE by Scott Crane of Plaintiff's Objections to Defendant's Counter-Designations and Objections relating to Deposition of Brian Bares	.30	25.50
	TMV	Review, finalize, format, convert and e-file NOTICE by Scott Crane of Plaintiff's Objections and Counter-Designations to Defendant's Video Deposition Designations of Brian Bares	.30	25.50
	TMV	Review, finalize, format, convert and e-file NOTICE by Scott Crane of Filing Plaintiff's Objections to Defendant's Exhibit List	.30	25.50
	TMV	Review, finalize, format, convert and e-file Additional Attachments to Main Document: [83] Response in Opposition to Motion	.30	25.50
	TMV	Download all file-marked documents for distribution to client	.40	34.00
10/09/2021	GPM	3 emails with Client and lacuone. (Discount: reduced by .20)	.10	25.00
	JJI	3 emails re: Client's travel and trial (Discount: reduced by .20)	.10	25.00
	RLT	Attention to three (3) e-mails with attorneys McAllister and lacuone and team regarding logistics of trial and client's travel (Discount: reduced by .20)	.10	8.50
10/11/2021	GPM	Draft outline for opening statement.	2.20	550.00
	GPM	Draft notes for Crane direct-examination.	2.30	575.00
	JJI	Continue and finish boxing and numbering transcript of Schwarz	4.40	1,100.00
	JJI	19 emails re: pre-trial activities (Discount: reduced by 1.20)	.70	175.00
	JJI	Review and update TDL for trial; directive on Schwarz trial subpoena; review info. on Mazzant procedures/preferences	1.30	325.00
	RLT	Attention to nine (9) e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by .70)	.20	17.00
	RLT	Prepare trial subpoena for witness Mark Schwarz for attorney review	.30	25.50
	RLT	Attention to pre-trial documents, logistics and hotel reservation; research regarding restaurants and delivery services for food (Discount: reduced by .70)	.90	76.50
10/12/2021	AOR	1 email with lacuone and McAllister regarding a bench brief on [REDACTED]	.10	25.00
	GPM	Meet with lacuone re witnesses.	.20	50.00
	GPM	Draft revisions to Page cross-examination.	.20	50.00
	GPM	Notes for Allen cross-examination.	1.10	275.00
	GPM	Meet with Dunn re: opening statement strategy	.60	150.00
	JJI	Review Schwarz depo. from Ronnie Parker and pull excerpts for cross-X	2.50	625.00
	JJI	Call [REDACTED]	.70	175.00
	JJI	Prepare and instructions on various trial briefs including [REDACTED] statements by Rave employees [REDACTED] etc; draft outline for Schwarz cross-X w/summary of boxed clips & page/line	2.40	600.00

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	JJI	Confer with McAllister re: witnesses	.20	50.00
	RLT	Attention to 34 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 2.60)	.80	68.00
	RLT	Communications with trial tech regarding logistics of trial and documents; upload various documents including deposition transcripts	.30	25.50
	RLT	Attention to outlines and clips for trial presentations	.80	68.00
	RRD	Conference w/McAllister re ideas for opening statement and listen to his analysis	.60	150.00
10/13/2021	AOR	3 emails with lacuone and McAllister regarding bench briefs (Discount: reduced by .20)	.10	25.00
	GPM	Analysis re Schwarz subpoena.	.30	75.00
	JJI	31 emails re: trial prep. issues (Discount: reduced by 2.20)	.90	225.00
	JJI	Continue working on Schwarz outline for cross-x from boxed impeachment clips; directives on [REDACTED]; directive on additional research projects/bench briefs; thoughts on demonstratives	5.40	1,350.00
	RLT	Attention to 54 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 3.80)	1.60	136.00
	RLT	Attention to working with trial tech regarding Bares and Bafundo video clips and designations; review file material regarding service/filing of same	1.10	93.50
	RLT	Finalize trial subpoena, calculate fees and update with same	.40	34.00
10/14/2021	AOR	Begin review and analysis of case law regarding use of prior testimony to impeach a witness	.20	50.00
	JJI	Directive re: filing trial subpoenas along w/waiver of service & fees	.20	50.00
	JJI	16 emails re: trial [REDACTED] depo. transcripts; war room issues; hotel issues; cross-x issues; expert issues (Discount: reduced by .90)	.70	175.00
	JJI	Pretrial activities including revising reordering Schwarz cross-x, Board ideas, chrono. ideas, review of both parties exhibits and what still at issue	3.50	875.00
	RLT	Attention to ten (10) e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by .70)	.30	25.50
	RLT	Research on taxable court expenses and review of file material for same; draft	1.20	102.00
	RLT	Attention to various pre-trial activities, filings, documents and trial matters and exhibits	2.10	178.50
10/15/2021	AOR	2 emails with lacuone and McAllister regarding bench briefs and memos (Discount: reduced by .10)	.10	25.00
	GPM	Notes and analysis for cross-examination of Bares.	2.90	725.00
	GPM	Analysis and revisions re void dire questions.	1.00	250.00
	GPM	Call with opposing counsel.	.10	25.00
	GPM	22 emails with expert, consultant, lacuone, Client. (Discount: reduced by 1.60)	.60	150.00

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	GPM	Notes re Bares, Page, and Allen cross-examinations.	3.40	850.00
	GPM	Meet with Dunn re checklist for trial	.30	75.00
	JJI	Review trial forms & pull outlines/examples and format for trial including voir dire, objections etc.	2.20	550.00
	JJI	Significantly revise and add to voir dire outline/intro. and specific question about case & incorporating expert ideas	2.80	700.00
	JJI	11 emails re: pretrial activities (Discount: reduced by .70)	.40	100.00
	RLT	Attention to 16 e-mails with attorneys McAllister and Iacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 1.10)	.50	42.50
	RLT	Research pattern jury charges and prepare notebooks with same for trial	.40	34.00
	RLT	Assist with various pre-trial activities, preparation and planning of trial matters	2.40	204.00
	RRD	Email with team re: trial prep checklist	.10	25.00
	RRD	Conference w/McAllister re trial checklist and my suggestions	.30	75.00
10/16/2021	JJI	Review detailed notes/analysis from expert re: jury questions/issues	.30	75.00
	RLT	Attention to seven (7) e-mails with attorneys McAllister and Iacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by .50)	.20	17.00
	RLT	Forward deposition videos to trial tech	.30	25.50
10/17/2021	GPM	Revisions to opening statement, analyze exhibits, revisions to witness examinations.	6.60	1,650.00
	GPM	Analysis and notes to prepare for hearing re deposition designation objections and exhibits objections.	2.90	725.00
	GPM	Meet with Dunn re voir dire	.20	50.00
	JJI	Meetings w/McAllister; draft board mock-ups	.50	125.00
	JJI	Update voir dire draft and circulate; start working on boards	1.80	450.00
	JJI	Review proposed questions for cross-X of Rave's expert witnesses	.40	100.00
	RLT	Preparation of indices for trial notebooks	1.80	153.00
	RLT	Attention to seven (7) e-mails with attorneys McAllister and Iacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by .40)	.30	25.50
	RLT	Prepare binders with all expert reports for trial team	.30	25.50
	RLT	Attention to preparing defendant's exhibit notebooks (cross reference with Plaintiff's exhibits)	2.60	221.00
	RRD	Conference w/McAllister re give him articles and discuss voir dire	.20	50.00
10/18/2021	AOR	Review and analysis of the requisite procedure for [REDACTED]	.90	225.00
	AOR	Review and analysis of case law regarding use of deposition testimony [REDACTED]	1.50	375.00
	AOR	Review and analysis of the procedure for use of prior inconsistent [REDACTED]	1.20	300.00

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	AOR	Begin review and analysis of case law regarding the timing of [REDACTED]	.40	100.00
	CMM	2 emails with attorney team regarding bench brief arguing [REDACTED] (Discount: reduced by .10)	.10	25.00
	GPM	Draft revisions to opening statement, notes re voir dire, revise Crane direct examination.	4.70	1,175.00
	JJI	Work on various pretrial activities, including jury selection/review clip report for Schwarz, review expert questions for ours/against theirs, review research; work on various trial boards and 35 emails re: pretrial activities/jury selection	7.10	1,775.00
	RLT	Attention to 23 e-mails with attorneys McAllister and Iacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 1.60)	.70	59.50
	RLT	Review court's order regarding submission of exhibits; attention to Plaintiff's exhibits and marking all exhibits for the court	1.20	102.00
	RLT	Attention to updating research files with bench brief and research	1.20	102.00
	RRD	4 emails with team re: trial boards (Discount: reduced by .20)	.20	50.00
10/19/2021	AOR	Prepare a trial brief on the ability and procedure to [REDACTED]	3.70	925.00
	AOR	Continue review and analysis of case law regarding the timing of [REDACTED]	.90	225.00
	AOR	Review and analysis of case law regarding the computation of [REDACTED]	1.60	400.00
	AOR	Review and analysis of case law regarding the timing of [REDACTED]	.70	175.00
	AOR	Review and analysis of case law and the federal rules regarding a timely request for a [REDACTED]	.80	200.00
	AOR	1 email with Iacuone and McAllister regarding bench brief	.10	25.00
	CMM	Review and analyze pleadings in preparation for drafting bench brief	.30	75.00
	CMM	Research regarding use of [REDACTED] evidence	.60	150.00
	CMM	Draft bench brief arguing for admission of [REDACTED] evidence	.80	200.00
	GPM	Rehearse opening and revise opening.	3.90	975.00
	GPM	25+ emails with Client, Iacuone, paralegal, opposing counsel, experts. (Discount: reduced by 1.50)	1.00	250.00
	JJI	Call w/Speckhart re: jury selection	.10	25.00
	JJI	Revise demonstratives, meetings w/expert, trial director, jury consultant, RDG team, review depo. cuts & confirm correct, confirm depo. cuts comport w/outline summary, expert issues - review Rave expert's reports and mark-up/add to cross-x questions etc; 68 emails re: same	7.70	1,925.00
	JJI	Confer with Dunn re: storyboard ideas and [REDACTED] he previously used	.30	75.00
	RLT	Attention to 50 e-mails with attorneys McAllister and Iacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 3.00)	2.00	170.00
	RLT	Work with trial tech on boards and demonstratives	1.20	102.00
	RLT	Finalize hotel logistics	.20	17.00
	RLT	Assist with deposition cuts and various pre-trial activities	1.30	110.50

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	RLT	Final review of trial checklist to confirm trial logistics and all trial materials are prepared and ready for transport	1.60	136.00
	RRD	Conference w/lacuone re pre chart magnetic demonstrative I used and ideas for story board	.30	75.00
10/20/2021	AOR	Prepare a memorandum on the timing of computation of [REDACTED]	2.90	725.00
	AOR	1 email with lacuone and McAllister regarding memos	.10	25.00
	CMM	Continue drafting and revise bench brief arguing for admission of [REDACTED]	2.20	550.00
	CMM	1 email to attorney team regarding draft bench brief (Discount: reduced by .10)		No/Chg
	GPM	Prepare to meet with Client	.50	125.00
	GPM	Meet with Client (8:30-5p)	8.00	2,000.00
	GPM	Draft revisions to direct examination for Crane.	.70	175.00
	GPM	20 emails with Client, lacuone, paralegal, opposing counsel. (Discount: reduced by 1.40)	.60	150.00
	GPM	Revise and rehearse opening statement.	3.30	825.00
	JJI	Meetings w/Crane, experts, call with opposing counsel re: exhibits, work on direct of Schwarz from cross-X, work on items to discuss w/Court at pretrial conference, review clip reports for directs and cross-x to ensure correct, review objs to both ex. lists to prepare for call with Rave counsel; create checklist/Qs for pretrial; revise bench brief on Ronnie Parker and finalize for filing	7.20	1,800.00
	RLT	Attention to 42 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning	4.20	357.00
	RLT	Update research files for trial team	.30	25.50
	RLT	Revise, finalize, convert and file trial brief	.40	34.00
	RLT	Assist with various trial matters; prepare hearing notebooks for pre-hearing conference for attorneys McAllister and lacuone	2.30	195.50
	RRD	Receipt and review court notification re: trial brief filed by Crane (Discount: reduced by .10)		No/Chg
10/21/2021	ADG	Analysis of Plaintiff's Brief in Support of Motion in Liminie	.40	100.00
	ADG	Analysis of Defendant's Brief in Opposition to Plaintiff's Brief in Support of Motion in Liminie	.40	100.00
	ADG	Analysis of Texas and Fifth Circuit authorities discussing whether [REDACTED]	1.90	475.00
	ADG	Analysis of Texas and federal cases discussing admissibility of evidence of prior similar acts [REDACTED]	1.40	350.00
	ADG	Analysis of reply to Defendant's Brief in Opposition to Plaintiff's Motion in Liminie	.20	50.00
	AOR	Review and revise memorandum of the timing of [REDACTED]	.70	175.00
	AOR	Review and analysis of case law regarding the ability or necessity to [REDACTED]	.80	200.00
	AOR	Prepare a memorandum on the necessary timing of a plaintiff's request	1.20	300.00

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	AOR	1 email with lacuone and McAllister regarding memos	.10	25.00
	CJP	Lengthy conference with McAllister to perform dry run of opening argument and discuss strategy for refinement of same	1.10	275.00
	GPM	Revise opening and email with consultant re same.	.80	200.00
	GPM	Analysis and preparation for pre-trial hearing, analysis re exhibits, rehearse/revise opening statement, analysis re voir dire, analysis re designations, notes re demonstratives.	9.00	2,250.00
	JJI	Trial prep/prepare for pretrial hearing issues on experts, exhibits, limines, etc. & prepare for trial	7.40	1,850.00
	RLT	Attention to 56 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 3.80)	1.80	153.00
	RLT	Finalize all file material and trial binders	1.80	153.00
	RLT	Attention to packing trial materials and labeling trial boxes	2.10	178.50
	RRD	4 emails and court notifications re; contact with Ronnie Parker to testify, RESPONSE to [89] Trial Brief (Plaintiff's Bench Memorandum) filed by Rave Restaurant Group, Inc. and TRIAL BRIEF Reply in Further Support of Trial Brief Regarding Defendant's Ronnie Parker Motion in Limine by Scott Crane (Discount: reduced by .20)	.20	50.00
10/22/2021	ADG	Analysis of [REDACTED] and other cases cited by Defendant to [REDACTED]	1.10	275.00
	ADG	4 emails with lacuone and/or McAlister re: trial issues (Discount: reduced by .20)	.20	50.00
	GPM	Travel to/from and attend pre-trial hearing.	5.00	1,250.00
	GPM	Prepare for and call with opposing counsel.	.30	75.00
	GPM	Draft revisions for preliminary jury instructions, notes re voir dire, and witness notes.	1.60	400.00
	JJI	Attend pretrial and continue trial preparation including update cross-x; update exhibit and deposition objections/designations and directives for playing; jury voir dire outline/feedback; 58 emails; travel to/from Sherman (Discount: reduced by 2.70)	9.10	2,275.00
	RLT	Attention to 62 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 4.60)	1.60	136.00
	RLT	Attention to trial matters, voir dire, opening and experts	2.60	221.00
	RRD	3 court notifications re: Minute Entry for proceedings held before District Judge Amos L. Mazzant, III: Final Pretrial Conference held on 10/22/2021; ORDER granting [55] Joint Motion in Limine; Order on Defendant's Motion tin Limine (Discount: reduced by .20)	.10	25.00
10/23/2021	ADG	Analysis of authorities discussing admissibility of [REDACTED] evidence under Federal Rule of Evidence [REDACTED]	1.50	375.00
	ADG	Analysis of authorities discussing admissibility of [REDACTED]	1.40	350.00
	ADG	Analysis of Fifth Circuit authorities in which evidence of motive and intent was admitted	1.60	400.00
	ADG	Prepare memo discussing [REDACTED]	1.90	475.00

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		case to facts of this case		
	GPM	Meet with Client, revise outlines, prepare for trial.	8.00	2,000.00
	JJI	Continue pretrial preparation, meeting w/client; revise Voir Dire after pretrial instructions; revise direct of Schwarz; directives on R. 11 for exhibits non-objected to; practice voir dire; practice 5 minute opening; review exhibits to use	8.10	2,025.00
	RLT	Attention to 13 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by .90)	.40	34.00
	RRD	Meet w/Client and Team to discuss trial [REDACTED]	.30	75.00
	RRD	Draft Client letter for trial tips about [REDACTED] at trial and [REDACTED]	.20	50.00
10/24/2021	GPM	Travel to Sherman and prepare for trial.	13.00	3,250.00
	JJI	Review Crane transcript and feedback; revise various outlines & for voir dire; pack boxes for Sherman; travel Sherman; continue preparing voir dire outline & opening; continue preparing Schwarz direct w/exhibits highlighting; meet w/jury consultant; meet w/team	12.80	3,200.00
	RLT	Attention to 19 e-mails with attorneys McAllister and lacuone and team regarding trial action items, trial logistics, strategy and planning (Discount: reduced by 1.30)	.60	51.00
	RLT	Travel to Sherman; set up war room and prepare for trial	8.00	680.00
	RRD	Email to team re: trial prep	.10	25.00
10/25/2021	GPM	Prepare for trial, attend trial, prepare for next day of trial and call with Dunn	14.00	3,500.00
	JJI	Prepare for Voir Dire, take Voir Dire, prepare for first witness Schwarz, take Schwarz, prepare for next day Schwarz, other pretrial materials/strategy	15.20	3,800.00
	RLT	Attention to 16 e-mails with attorneys McAllister and lacuone and team regarding trial action items, strategy and planning (Discount: reduced by 1.00)	.60	51.00
	RLT	Attend trial	10.00	850.00
	RLT	Prepare late at night for next day of trial	3.00	255.00
	RRD	Court notifications re: Joint Final Pre-trial order and minute entry for Day one proceedings (Discount: reduced by .10)	.10	25.00
	RRD	Conference w/GPM re download on 1st day of trial	.20	50.00
10/26/2021	ADG	Conference with lacuone re: witness [REDACTED]	.10	25.00
	ADG	Analysis of available sanctions for witness [REDACTED]	1.40	350.00
	ADG	Analysis of [REDACTED]	1.80	450.00
	ADG	Analysis of [REDACTED] issues	1.40	350.00
	ADG	Analysis of sanctions and penalties for providing [REDACTED]	1.90	475.00
	ADG	6 emails with team re: witness issues (Discount: reduced by .40)	.20	50.00
	GPM	Prepare for trial, attend trial, prepare for next day.	16.00	4,000.00

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	JJI	Continue Schwarz, prepare for experts of 2 cross-x and 1 direct expert Spindler, help with Crane direct, work on closing and 2 calls with Dunn	16.10	4,025.00
	RLT	Attend trial and attention to 51 e-mails with attorneys McAllister and lacuone and team regarding trial action items, strategy and planning	10.00	850.00
	RLT	Prepare for next day of trial	2.00	170.00
	RRD	Call with witness Ronnie Parker re possibility of testifying	.30	75.00
	RRD	Calls (2x) w/lacuone re Ronnie Parker	.30	75.00
	RRD	Conference w/lacuone re end of day update	.20	50.00
10/27/2021	ADG	2 emails with lacuone re: whether [REDACTED] (Discount: reduced by .10)	.10	25.00
	ADG	Research re: whether [REDACTED]	.40	100.00
	ADG	Confer with Dunn regarding trial and [REDACTED]	.20	50.00
	GPM	Prepare for trial, attend trial, prepare for next day of trial.	16.00	4,000.00
	JJI	Assist w/Crane direct thoughts/questions; prepare for and take Spindler direct; prepare for and start cross-X of Rave expert Cumberland; prepare for next day cross-X of experts; rest case	16.70	4,175.00
	RLT	Attention to 23 e-mails with attorneys McAllister and lacuone and team regarding trial action items, strategy and planning (Discount: reduced by 1.60)	.70	59.50
	RLT	Attend trial	10.00	850.00
	RLT	Prepare at night for next day of trial	2.00	170.00
	RRD	2 court notifications re: minute entry for proceedings for trial day 3 (Discount: reduced by .10)	.10	25.00
	RRD	Conference w/Gross re [REDACTED]	.20	50.00
10/28/2021	ADG	2 emails with lacuone re: closing argument (Discount: reduced by .10)	.10	25.00
	ADG	Analysis of [REDACTED]	1.60	400.00
	ADG	Review closing argument	.40	100.00
	ADG	Analysis of Fifth Circuit authorities discussing [REDACTED]	1.80	450.00
	GPM	Prepare for trial and attend trial.	10.00	2,500.00
	JJI	Continue Rave's experts' cross-X; closing argument - prepare for in morning cross-X and closing argument	12.30	3,075.00
	RLT	Attend trial and attention to 12 e-mails with attorneys McAllister and lacuone and team regarding trial and jury deliberation	10.00	850.00
	RLT	Break down war room and pack up all trial material to return to Dallas	2.20	187.00
	RRD	Court notification and 8 emails re: Doug Branch (Def's expert) and Court's Minute Entries for trial proceedings Day 4 (Discount: reduced by .50)	.30	75.00
	RRD	Conference w/para re [REDACTED]	.20	50.00
	TMV	3 emails with team re: [REDACTED] (expert) (Discount: reduced by .20)	.10	8.50
	TMV	Review our server and Dunn's emails to confirm [REDACTED]	.20	17.00

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	TMV	Confer with Dunn regarding [REDACTED]	.20	17.00
10/29/2021	GPM	Attend to Court for jury questions/deliberations and travel to Dallas.	8.50	2,125.00
	JJI	Wait for jury verdict and conferences re: options prior to same and travel	8.50	2,125.00
	RLT	Attend trial and attention to 11 e-mails with attorneys McAllister and Iacuone and team regarding trial action items, strategy and planning	8.50	722.50
	RRD	8 court notifications re: Trial minute entry, jury instructions, Crane's trial witness list, Rave's trial witness list, Crane's admitted trial exhibits, Rave's admitted trial exhibits, Jury verdict (Discount: reduced by .50)	.30	75.00
TOTAL FOR CURRENT SERVICES RENDERED			566.50	118,508.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
R. Rogge Dunn	5.20	\$250.00	\$1,300.00
A. David Gross	23.40	250.00	5,850.00
Joshua J. Iacuone	195.20	250.00	48,800.00
Greg McAllister	174.80	250.00	43,700.00
Cori McComber	6.10	250.00	1,525.00
Chase Potter	1.10	250.00	275.00
Anna Richardson	20.60	250.00	5,150.00
Rhonda L Thomas	136.60	85.00	11,611.00
Tina M. Vanderburg	3.50	85.00	297.50

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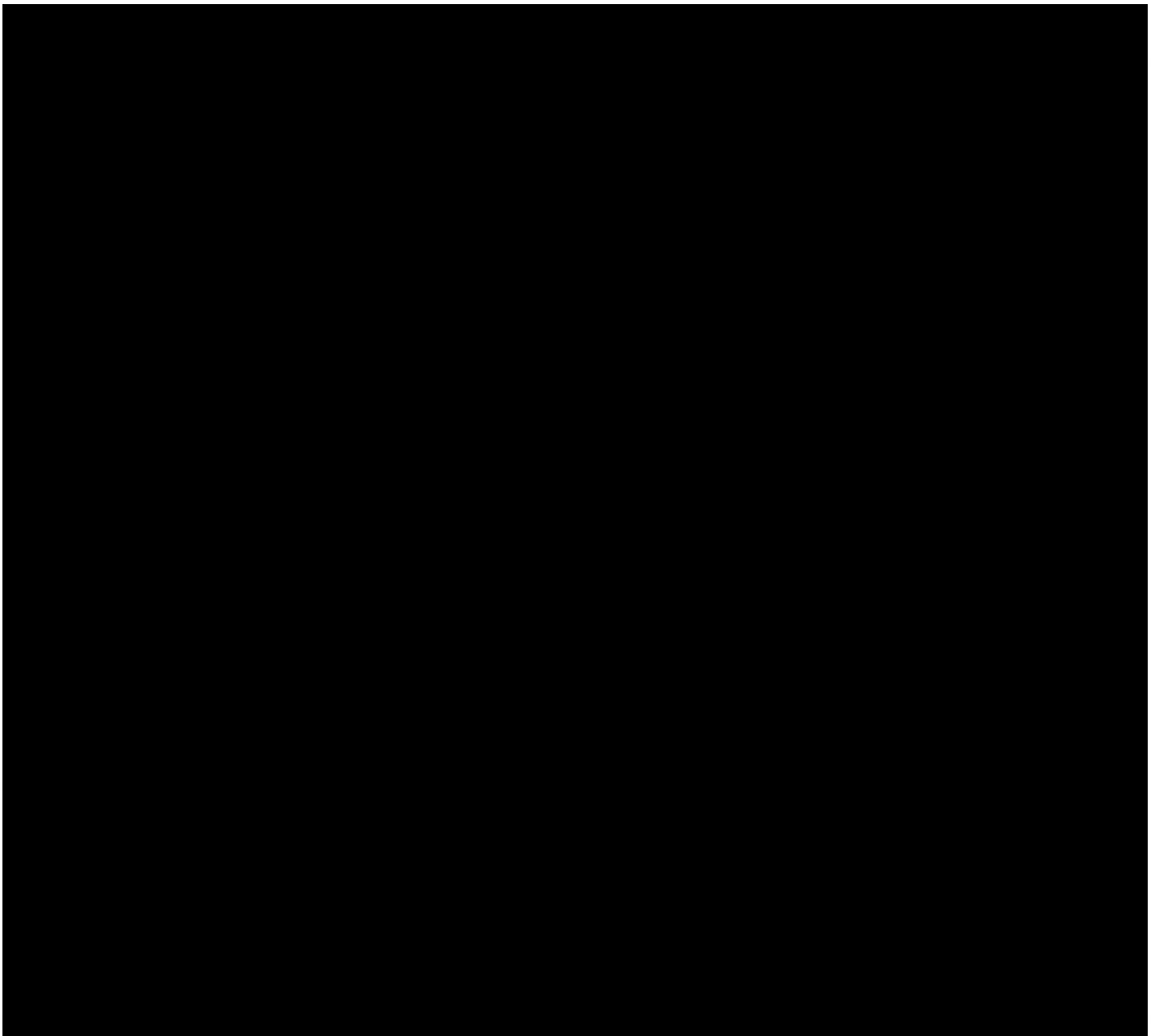


EXHIBIT C



Rogge Dunn

Rogge Dunn is a fifth generation Texan and second generation Dallasite. Dunn and his wife, Cathy DeWitt Dunn, are active in charitable, political, and civic causes.

Direct: 214.220.0077
Mobile: 214.356.6666
Email: Dunn@RoggeDunnGroup.com
LinkedIn: linkedin.com/in/roggedunn/

Board Certifications

- Civil Trial Law
- Labor & Employment Law
- Texas Board of Legal Specialization

Adjunct Professor

- Adjunct Professor, Southern Methodist University, MBA Program 1986–1998, 2008–present.

Education

- J.D., *cum laude*, UT Law School, 1983
- Texas Law Review 1982-83
- Board of Advocates 1981-83
- B.A., *cum laude*, SMU, 1980 (Departmental Distinction: English)

Judicial Clerkship

- Law Clerk to Hon. Reynaldo Garza, U.S. Fifth Circuit Court of Appeals 1983-84

PAC Treasurer

- Treasurer, Bloomin' Brands, PAC — Texas

Finance Co-Chair

- Finance Co-Chair for John Creuzot for DA campaign

Court Admissions

- The Texas Bar
- The United States Supreme Court
- The United States Court of Appeals for the Fifth Circuit
- All Federal district Courts in Texas
- The Middle District of Florida
- The Western District of Oklahoma
- The Eastern and Western Districts of Missouri
- The Eastern and Western Districts of Arkansas
- The District Court of Colorado
- The District Court of District of Columbia.

Dunn Understands Executives & Business Owners

Successfully resolving business disputes requires more than good negotiating skills. It requires appreciating how businesses operate and executives think. Dunn is an Adjunct Professor in the SMU Executive EMBA program. His 20+ years of teaching, including listening to and exchanging business solutions with successful entrepreneurs, enables him to reach business-smart solutions.

Complex Litigation

Dunn is one of only 25 attorneys in Texas Board Certified in both Civil Trial Law and in Labor and Employment Law. He litigates business, employment, and personal injury disputes throughout the country. He has represented clients in Australia, Brazil, Canada, China, Dubai, England, France, Hong Kong, India, Mexico, the Netherlands, Scotland, Spain, and Qatar. Dunn handles partnerships, FINRA arbitration, class actions, defamation, privacy issues, shareholder oppression, business divorce, non-competes, trade secrets, whistleblowing, & significant personal injury matters.

Confidentiality

While Dunn's high-profile cases have garnered national and international attention, he has discretely resolved many more cases not listed on our website. Dunn knows that many clients need a quick, quiet, and confidential resolution. Dunn helps individuals and corporations in delicate or compromising situations who need a sophisticated and discrete touch. These include everything from assaults, regulatory violations, sexual battery, doxxing, secret videotaping, and illegitimate children. Clients who need an experienced and politically connected problem solver hire Dunn.

Controlling the Narrative

In this instant messaging and social media environment, stories go viral in a matter of seconds. Working with top PR firms, Dunn ensures the facts involving legal claims are portrayed accurately.

Change-in-Control Agreements

Dunn has advised C-level executives in mergers, change-in-control, and "poison pill" battles involving Baker Hughes, Chevron, Dresser, FedEx, Frozen Food Express, GE Energy, Halliburton, Kinkos, Pizza Inn, Sperry-Sun Drilling, SunEdison, Unocal, and the Williams Companies.

Corporate Investigations

Fortune 500 companies hire Dunn to investigate corporate governance and other sensitive matters. One of Dunn's investigations was cited by the U.S. Fifth Circuit Court of Appeals as a basis for his client (CBRE) obtaining a summary judgment. *Sandstad v. CB Richard Ellis*, 309 F.3d 893 (5th Cir. 2002).

Representation of High Profile Individuals

Dunn represents ultra-high net worth individuals, Fortune 500 executives, General Counsels, private equity firms, coaches, professional athletes, Olympic gold medal winners, Judges, and University Presidents. One of the highest testaments to Dunn's abilities is the fact that many companies and individuals Dunn has sued, later hired Dunn to represent them.

Is Your Case Too Small?

Most of Dunn's work involves high dollar, "bet the company/bet your reputation" matters. However, as Dunn says, "I became a lawyer because I enjoy fighting for a good cause. There is no greater privilege in my work than righting a wrong and slaying a Goliath." Dunn's success gives him the financial security to accept smaller matters, work on a contingent fee, and a pro bono basis.

Paper Pushers Can Take You Only So Far

Choose your attorney carefully. Many attorneys are adept at pushing paper, but seldom take cases all the way to a jury verdict. Ask the lawyer specifically how many times he or she has obtained a jury verdict. Hiring an experienced trial lawyer who flourishes at trial increases your settlement leverage. If the other side knows your lawyer is bluffing, you will leave money on the table or overpay if you are a defendant. When the other side knows they are negotiating against a seasoned trial attorney, you maximize your settlement position, as either a plaintiff or defendant.

Thinking and Operating "Outside the Box"

Dunn earned his spurs as a Senior Partner in two different mega-firms with offices around the world. While huge firms are a good choice for many matters, they are bureaucratic and often lack flexibility and entrepreneurial spirit. Dunn formed our Firm to provide the contingent fee flexibility and personal service lacking in most big firms.

Awards

- Named one of the most powerful business leaders in North Texas 2021 in D CEO's 2021 Edition of the Dallas 500
 - 2021
- Rated as one of the top 100 attorneys in Texas, a Thomson Reuters service published in Texas Monthly
 - 2018 and 2008
- Recognized as one of the Best Lawyers in Dallas by D Magazine
 - 2021, 2020, 2019, 2018, 2016, 2015, 2013, 2012, 2011, 2009, 2005, 2003
- Rated a top 100 attorney in Dallas/Fort Worth, a Thomson Reuters service published in Texas Monthly
 - 2018, 2017, 2011, 2010, 2009, 2008, 2006, and 2005
- Rated as one of the Best 93 Lawyers in Dallas who represent individuals by D Magazine
 - 2009
- Honored as a Texas "Super Lawyer," a Thomson Reuters service, published in Texas Monthly
 - Every year 2003 to 2019
- Recognized in The Best Lawyers in America® for Commercial Litigation and Employment Law Management
 - 2021, 2019, 2018, 2017, 2016
- Rated as Leading Lawyer in America, LawDragon
 - 2016, 2015, 2010, 2008, 2007
- Purveyor of the Year, Multi-Concept Outback Steakhouse
 - 2010, 2009, 2008, 2007, 2006 and 2005
- Purveyor of the Year, Outback Steakhouse
 - 2004, 2002, 2001
- Purveyor of the Year, Carrabba's Italian Grill
 - 2004, 2002
- Board Certified: Civil Trial Advocacy National Board of Trial Advocacy
 - 2003
- Life member, Million Dollar Advocates Forum
 - 1999
- Martindale Hubbell AV Preeminent rating
 - 2010 to present
- Martindale Hubbell AV Rating
 - 1996 to present
- Life Fellow, Texas Bar Foundation
 - 2006
- Distinguished Pro Bono Service Award, N. Tex. Legal Services
 - 1988



Results

- Obtained TROs, injunctions and other equitable relief throughout the nation
- Successful defense of oil and gas company exercising preferential purchase rights involving O&G properties in New Mexico and Texas worth \$1.5+ billion (New Mexico)
- Successful defense of oil and gas partnership sued over ownership of 30,000 acre mineral lease involving Barnett Shale in West Texas worth an estimated \$1 billion
- Successful defense of insurance carrier in \$100 million commercial mold claim
- Negotiated removal of co-manager, loan payoff and extinguished management rights of minority members of healthcare company worth \$50+ million
- Successful defense of Fortune 500 real estate company sued for \$43 million over sale of Arkansas office park (Arkansas)
- Won summary judgment in favor of inspection company sued for \$38 million for alleged defective inspection of pressure vessels on offshore rigs and won \$92,000 in attorneys' fees against the Plaintiff
- Hired by the Commonwealth of Pennsylvania to enforce a \$14.3 million judgment in Texas
- Obtained \$13 million severance package for President of American Airlines
- Successful defense of law firm partner sued by former partner regarding dispute over a \$13+ million attorneys' fee
- Won divorce trial enforcing Client's \$10.5 million marital property agreement
- Obtained summary dismissal in favor of Client, Texas Tech President Guy Bailey, in \$12.5 million dollar lawsuit filed in Lubbock by former coach Mike Leach against Texas Tech University and Tech's President
- Successful defense and settlement of overtime, travel time and job classification claims filed against an oil and gas company in San Antonio
- Successful defense and settlement of overtime claim claims by pumpers against an oil and gas company in Midland
- Ongoing representation regarding real estate issues and litigation for private equity real estate group with more than \$1 billion in assets
- Successful negotiation of commission interests for Fortune 500 commercial real estate brokerage firm involving \$65 million Austin land sale
- Obtained expungement in 84 days for a financial advisor that Morgan Stanley who manages \$1+ Billion in AUM
- Defense and favorable settlement for corporate entity sued by two plaintiffs for wrongful death and serious injury arising out of activities on executive's private hunting camp in South Texas
- \$800,000 settlement for client who contracted food poisoning at an Oklahoma restaurant (client's net \$510,000)
- Obtained summary judgement for Fortune 1000 company sued for \$9 million by employees' estates over a triple homicide in one of its East Texas stores
- Defended Barron's national top 100 financial advisors team sued in FINRA arb for \$1.5+ million on promissory note. Settled the prom note claim against all three clients for payment of only \$1,000
- Successful resolution of lawsuit for a property insurance carrier sued by medical practice group for \$1.5 million and insurance bad faith
- Won take nothing arbitration ruling in favor of a Fortune 150 company accused of discrimination and retaliation and obtained \$18,945 counter-claim judgment against the Plaintiff for repayment of unearned draws
- Successful defense of one of the world's largest insurance adjusting companies with 600 offices worldwide regarding non-compete and injunctive relief concerning C-level executive (Georgia)
- Successful defense and resolution for teenage driver sued in Denton for wrongful death for car crash that killed motorcyclist
- Successful defense of home care nursing company sued for wrongful death
- Obtained no cause dismissal of Sarbanes-Oxley complaint exonerating Fortune 150 company that executive had filed with Department of Labor
- Successful defense of numerous discrimination and other employment claims filed in North Texas against Fortune global 6 company filed with Dept. of Labor
- Successful defense of multi-million dollar breach of partnership agreement lawsuit against Fortune 1000 company (Oklahoma)
- Defense verdict in favor of Fortune 1000 company sued for \$6 million under partnership agreement

Results

- Successful defense of a top five executive in Fortune 10 company accused of breaking a non-compete and misappropriating trade secrets
- Successful defense of majority shareholder sued for shareholder oppression and breach of fiduciary duty by minority shareholder
- Successful defense of wrongful death lawsuit for drug manufacturer
- Successful defense and dissolution of TROs obtained in Houston and Dallas against Fortune global 300 company for tortious interference with contract and employee raiding involving its hiring of numerous executives from competitor
- Obtained take nothing dismissal in favor of lending broker sued for \$8 million for fraud, negligence and breach of contract involving a real estate development project
- Obtained take nothing dismissal in favor of Fortune 500 executive sued in a glass ceiling class action lawsuit
- Won divorce trial enforcing Client's 10.5 million marital property agreement
- Successful defense of law firm partner sued by former partner regarding dispute over a \$13+ million fee
- \$750,000 whistleblowing settlement for a C-Level exec working for company in India (client's net \$600,000) (North Carolina)
- \$925,000 settlement in FINRA arbitration for Barron's national top 100 financial advisor fired by Wall Street firm (Client's net \$610,000)
- \$1 million settlement in arbitration for fired executive (Client's net \$950,000)
- Won \$1 million FINRA arbitration award for fired Los Angeles Barron's national top 100 financial advisors against Goldman Sachs (Client's net \$580,000) (California)
- \$1.03 million settlement for Wall Street broker laid off by a New York investment bank
- \$1.04 million verdict for nurse for bullying and wrongful discharge. When doctors threatened bankruptcy, obtained settlement of \$440,000 (Client's net \$152,000)
- \$1.1 million severance for fired Branch Manager of international investment bank with a market cap exceeding \$30 billion
- \$1,135,000 settlement for minority partner for breach of fiduciary duty against \$250 million private equity fund
- Obtained \$1.17 million in CIC payments for fired Vice President of Fortune 400 Oil & Gas Company (Pennsylvania)
- \$1.2 million verdict for client suing for sexual harassment, sex discrimination and retaliation (Client's net, \$240,000)
- \$1.2 million for Managing Director of a British petroleum company who exercised "good reason" termination after a change-in-control (England)
- \$1.2 million settlement at trial for City of Beaumont suing for breach of contract and warranty involving industrial pumps (Client's net \$850,000)
- \$1,299,000 settlement for change-in-control and sex discrimination claims for female SVP at Fortune 400 oil & gas company (Client's net \$1,232,000) (Oklahoma)
- \$1.375 million settlement for invasion of privacy (Client's net, \$880,000)
- \$1.4 million settlement for construction defects in Missouri lake house (Client's net \$785,000) (Missouri)
- \$1.45 million severance package for executive with dairy company (Client's net \$1,428,000)
- \$1.6 million settlement of sex discrimination claims for female VP fired by oil & gas LLC (Client's net \$1,502,000)
- \$1.67 million settlement for CEO fired from computer consulting company (Virginia)
- \$1.7 million in cash and real property for minority shareholder in a shareholder oppression lawsuit. (Client's net \$1.3 million)
- Obtained \$1.784 million CIC good reason resignation payment for VP of Fortune 300 oil & gas company (Client's net \$1.781 million)
- \$2.2 million settlement for Client suing designer of display causing store fires in Florida and Massachusetts (Client's net \$1.6 million) (Massachusetts and Florida)
- \$2.395 million settlement for minority shareholder in shareholder oppression lawsuit
- \$2.5 million settlement for minority shareholder alleging shareholder oppression (Client's net \$1.8 million)
- \$2.5 million for fired executive of Fortune 50 food and beverage company
- Won \$2.5 million FINRA arbitration award in San Francisco for a fired Barron's national top 100 financial advisors (Client's net \$1,300,000) (California)

Results

- \$2.6 million for a fired C-level executive of a Fortune 200 homebuilding company
- \$2.6 million settlement for fired C-level executive of Fortune 100 beverage company (Canada)
- \$2.6 million settlement for hospital in commercial arbitration regarding improper installation of electrical system (Client's net \$1.9 million)
- \$2,642,000 settlement for change-in-control claims for Fortune 400 oil & gas C-Level executive (Oklahoma)
- \$2.8 million settlement for Pizza Inn CEO, who was fired after proxy fight and who Pizza Inn had sued for \$9.4 million (Client's net \$1,953,286)
- \$3.06 million settlement for construction defects in 40,000 square foot mansion (Client's net \$2.3 million)
- Obtained \$3.1 million change in control payments to four California and Utah executives at alternative energy company (Clients' net \$2,477,000) (California and Utah)
- \$3.1 million settlement for President of an oil and gas company fired after a change-in-control
- \$3,663,516 settlement for change-in-control claims for Fortune 400 oil & gas C-Level executive (Oklahoma)
- \$3.7 million settlement for CIC payments for fired SVP of Fortune 400 Oil & Gas Company (Oklahoma)
- \$3.95 million settlement for ousted part-owner for his interest in engineering firm (Client's net \$3.94 million)
- \$4 million settlement for President of an oil and gas company fired after a change in control
- \$4.1 million severance package for President of an oil and gas company who exercised "good reason" termination after a change in control
- \$4.5 million retirement/consulting package for Senior Vice President of manufacturing company
- \$4.5 million settlement for C-level executive of Scottish oil and gas company fired after a change in control (Scotland)
- \$4.8 million settlement for owner of salt dome storage facility against operator for causing well blowout (Client's net, \$3.1 million)
- \$4.9 million settlement for fired CEO who sued for disability discrimination
- Successful representation of Buster Corley, co-founder of Dave & Busters when he sold his interests in the company
- \$6 million settlement for Australian citizen who was COO of oil and gas company fired after a change in control (Australia)
- \$6.1 million severance package and negotiated succession plan for Chairman/CEO of a bank with more than \$11 billion in assets
- \$6.5 million settlement for public utility damaged by negligent power interruption (Arizona)
- Ongoing representation of CEO fired because of his sexual orientation (Hawaii)
- Obtained \$7.28 million in CIC payments for fired SVP of Fortune 400 Oil & Gas Company
- \$7,556,900 FINRA arbitration award for two financial advisors against Goldman Sachs for violating USERRA and for wrongful discharge (California) (Clients' net \$3,118,141)
- Ongoing representation of former Title IX Investigator regarding discrimination and Title IX claims against Baylor University
- Successful prosecution and settlement of class action lawsuit for 10 Park Rangers seeking upgraded status to become Dallas Police Officers
- \$8.3 million severance for Canadian citizen who resigned as CEO of Fortune 200 bottling group (Canada)
- \$8.7 million settlement for recycling facility damaged by the negligence of a power company in New Mexico (Client's net, \$4.4 million) (New Mexico)
- Negotiated 8 year contract, including \$7.8 million up-front bonus, for one of the top 5 radio personalities in the US, syndicated on 200+ stations. Contract gives client the right to self-market products and endorsements and keep 75% of the proceeds
- \$9.6 million settlement for insurance carrier in a commercial dispute with a flood zone determination company (Client's net, \$7.1 million) (Missouri)
- Successful negotiation of severance package for a departing partner including \$165,000 cash payment and a 1% trailing interest in an estimated \$800 million worth of real estate development deals
- Successful defense of oil and gas company exercising preferential purchase rights involving O&G properties in New Mexico and Texas worth \$1.5+ billion (New Mexico)
- Won take nothing dismissal for insurance carrier sued for \$2.5+ million on equipment breakdown insurance policy
- Successful defense of nationwide insurance carrier in 85 asbestos lawsuits filed by 2,500+ plaintiffs (Ohio)

Testimonials

"Rogge is Outback's go-to lawyer for significant commercial litigation. Also, for more than 20 years we have used Rogge to obtain injunctive relief for Outback in significant cases all across the country. I've seen a lot of trial lawyers in action. Rogge is one of the best."

Joe Kadow

"Rogge, You are one of those five special people in a life. Serious, talented but with a big heart. You remained so accessible and always attentive during a period of upheaval in our lives. We are forever grateful for your confidence, expertise, and personal touch--I owe you."

Brian Horan

"Rogge, thanks for making my transition from American to United a smooth, short and affordable flight."

Scott Kirby

"I have known and worked with Rogge on a number of important matters over the last 10 years, including having engaged him as part of a team of attorneys to handle . . . lawsuits in Texas and New Mexico. His creativity and insight has helped us achieve favorable outcomes."

David W. Copeland

"As a financial services company with more than \$2 billion in receivables and 750 employees in multiple states, we need a lawyer versed in the intricacies and particular needs of our industry. Rogge has helped us avoid litigation and solve disputes before they become problems. I have worked with Rogge for more than 15 years as in-house counsel for California Federal Bank and at Triad. I know when I call he will give me logical, workable solutions to the issues our company faces."

Tim OConnor

"Montague County was sued in federal court on an important and novel overtime claim. The County hired Rogge. Rogge and his team engineered a favorable settlement promptly and with a minimum of attorneys' fees."

Jeb McNew

"For many years Rogge has helped CBRE successfully resolve significant litigation and arbitration matters."

Ellis Reiter, Jr.

"Rogge handles MADD litigation nationwide. His trial experience has produced great results for our organization."

Leslie Moore

"When I was Sr. VP of Operations for Outback, I went to trial with Rogge in two lengthy and difficult lawsuits. His ability to connect with the jurors enabled Outback to win favorable jury verdicts both times. Once Rogge finished his devastating cross exam of the plaintiffs suing Outback, their cases were completely dismantled."

Steve Erickson

"When I needed a top notch attorney for advice on my employment contract, I chose Rogge. He was knowledgeable and very responsive. He protected my economic interests and professional reputation. Rogge knows how to play hardball. Big league managers to Fortune 500 CEOs choose Rogge for help in major employment and business disputes. Given his knowledge, experience, and reputation, Rogge is someone I have on my team."

Buck Showalter

"I have been opposite Rogge in protracted litigation and trial. Rogge is a hard fighter, a tireless advocate, and a consummate professional. During the trial in which we were against each other, he related well to New Orleans jurors. Since that case, I have referred clients to Rogge and continually receive positive reports on The Rogge Dunn Group. Rogge is a trial lawyer who will not blink, will always be prepared, and takes pride in getting solid results."

William Kelly, Esq.

Testimonials

"Rogge successfully enforced a non-compete for our company. When the former employee counter-claimed against us, Rogge's cross-examination at trial destroyed his case and enabled LODESTAR to win a great result. I have worked with some of the top lawyers in New York and Boston. Rogge's trial skills are among the best I've seen."

Lori Lynn

"When our trade secrets were misappropriated and a rogue website infringed on our trademark, we needed quick action. Rogge and his team promptly filed a federal trademark lawsuit and obtained a TRO and permanent injunction in state court. Rogge's understanding of the IT and IP issues enabled us to win a great result."

Mark Running

"As one of the largest forensic firms in the United States with 18 offices nationwide, our company needs a lawyer with national trial experience. Rogge has served our company as a counselor for 20+ years. When necessary, Rogge vigorously files lawsuits, quickly obtains TROs and wins permanent injunctions. Rogge is fantastic in court and is a winner."

Steve Powell

"Too many attorneys create roadblocks. It's refreshing to work with Rogge, who is a problem-solving trial attorney who helps us reach win/win resolutions."

Hal Rose

"Rogge grew up in the restaurant business and understands food and beverage issues. We turn to Rogge for legal advice because he knows the hospitality industry, knows Texas, and helps us avoid lawsuits. Rogge gets to the bottom line quickly and efficiently."

Brent Harman

"When a high-level executive was accused of harassment and discrimination, we trusted Rogge to investigate. His thorough and fair investigation enabled our company to make the right decision."

Wally Rosvall

"When our need for outside counsel arises, it usually demands prompt resolution. Rogge allows us to focus on our business, while he focuses on resolution. Bottom line: Rogge is the go-to guy. When our company had a business dispute with a Fortune 150 company, we needed a trial lawyer who understood large commercial transactions. Rogge filed suit and his aggressive strategy and tactics enabled us to promptly obtain a favorable settlement."

Randy Cimorelli

"In our fast-moving industry we need a business-savvy attorney who can take action on a moment's notice. Rogge is usually in the office by 5:30 a.m. and is available 24/7. We work on projects throughout the country and need outside counsel with a broad range of employment, business, and litigation experience. When we require help on significant legal matters, we turn to Rogge."

Ran Holman

"Rogge is a problem-solver whose proactive advice enables our organization to avoid legal problems. His integrity and ability to get to the bottom line helps us make the right decisions. However, when litigation is necessary, Rogge is the T-Rex of trial lawyers."

Nicole Small

"I've watched trial lawyers handle high profile cases from the Agent Orange litigation to the Exxon Valdez oil spill trial. Rogge's the best. Jurors love him."

George Speckart

"Our Company was sued for \$38 million regarding pressure vessels on offshore gas rigs. Rogge and his team won a summary judgment exonerating us of all liability and won a \$92,000 judgment for our attorneys fees against the plaintiff."

Jean Cohn

Testimonials

"Restaurateurs trust Rogge. When it came time for me to sell my interests in the restaurant chain I created and loved, it was important to leave the right way. Not only did Rogge protect my financial interests, he made the transition smooth and professional for all concerned."

Buster Corley

"Rogge did an excellent job of representing me and assisting Tech in winning the Coach Mike Leach lawsuit."

Guy Bailey

"When a PE firm with an activist investor reputation bought a controlling stake in the company, I knew I was in for a fight. They fired me without good cause, triggering my Change in Control benefits. They refused to pay my CIC benefits, falsely accused me of poison pill tactics and sued me personally for \$9.4 million. Then they waged a PR campaign against me. Rogge and I fought back and on the morning we started trial, they settled and paid me \$2.8 million, a \$12.2 million swing in my favor. And, my actions and reputation were vindicated in a New York Times article."

Ronnie Parker

"I trust Rogge. When I decided to retire and prepare a secession plan, I sought Rogge's advice. Rogge has extensive experience helping C-level executives at major companies. He has an excellent reputation among top executives. Rogge helped me negotiate key exit provisions to protect my equity interests and at the same time ensure a smooth transition to safeguard the bank and its shareholders. I've also sought Rogge's help on the front end to negotiate an executive contract with equity awards."

George Jones

"Rogge knows the financial industry. He helps relationship managers, investment bankers, branch managers and banking executives. When I decided to transition from a financial advisor to a relationship banker, I trusted Rogge. Rogge knows the ins and outs of non-compete law and facilitated my smooth and amicable transition. I hired Rogge a second time when a former employer tried to obtain a Temporary Restraining Order against me. Rogge defeated their attempt to obtain the TRO, and then negotiated a favorable settlement for me. Rogge, you are my lawyer for life."

Chris Doxey

"Fighting off enforcement of a large promissory note by a big firm is tough. The odds are skewed in favor of the firms. When I had to do battle with my old firm, I hired Rogge. He was committed to going all the way. Rogge shines in trial; he carved up my former Branch Manager on the witness stand during the trial. Rogge's cross-examination was not only fun to watch, but enabled me to win a 1/3 reduction of the amount my old firm was seeking. After the arbitration, Rogge stuck with me and wrote off a substantial portion of his fees. He then assisted me for free with additional legal strategies that wiped out the rest that I owed without me having to pay anything on the promissory note. Rogge, many thanks for a job well done. I'd go into battle with you anytime."

Rich Dwyer

"When I needed an inaccurate statement on my U-5 expunged, I interviewed several attorneys. They said on the one hand this could happen, on the other hand that could happen. Rogge was different; he presented me with a firm game plan. Rogge then quickly implemented the game plan and successfully obtained the expungement in less than 90 days."

Sean Lewis

"The key to success in business is building strong relationships with qualified people you can trust. As I was growing our company, I needed a lawyer who could not only help our company but an attorney I could trust as my personal lawyer for the long term. Rogge has been a reliable, creative and responsive partner in both areas. He and his firm have taken great care of me personally and my company for more than 20 years. With operations in more than 45 states we needed a lawyer who had handled matters across the U.S. and had relationships with other lawyers around the country. Rogge gets it; he understands the importance of long-standing relationships better than any attorney I have dealt with. When we were sued in California we hired big firm lawyers in California and received high bills, but no results. We asked Rogge to take over the case and his aggressive litigation tactics enabled us to resolve the case favorably on a cost-effective basis."

Doug Mitchell

Testimonials

"When it came time to sell our company, I needed an attorney experienced in liquidity events who also had a reputation as a tough litigator, in case the sale had to be resolved in the courtroom. I did my due diligence and Rogge came highly recommended. Entrepreneurs trust Rogge."

Angela Calvert

"Every entrepreneur who builds, runs and sells companies needs Rogge in his corner. I have truly enjoyed working with Rogge for the last 10+ years. He has helped me and my companies stay out of trouble. And, when liquidity events occur, Rogge helps maximize founders' returns."

Matt McIntyre

"When it came time to retire, I hired Rogge to protect my deferred compensation and ensure a professional departure. Rogge helped me obtain a successful departure promptly with a minimum of attorneys' fees."

Phillip Douglas

"Rogge has an excellent reputation for helping entrepreneurs and business owners navigate legal issues. He is also well-respected in the restaurant industry. When it came time for me to sell my interests in our restaurant chain, he was my top choice. Rogge's advice enabled me to cost-effectively negotiate the sale of my equity interests promptly and without any hiccups."

Marty Garvey

"When myself and my fellow C-level executive's had to fight for our change in control payments, we banded together and hired Rogge. His knowledge of California law and experience enforcing CIC agreements helped us quickly achieve our goals."

Rafael Dobrzynski

"Thank you for your legal work on my behalf. I appreciate your prompt assistance and efficiency."

Larry Brown

"Rogge, I cannot begin to thank you enough. You are a star! You are an excellent lawyer, thorough, extremely well prepared, fun and well-connected! Thanks again for your prompt and successful resolution of a significant and challenging legal matter for Benihana."

Cristina Mendoza

"Rogge is well known for his expertise in helping C-level executives negotiate contracts and non-compete issues. Not only is he a good counselor and trusted negotiator, but also an excellent trial attorney. I had the opportunity to observe him in action in a mock trial and it's comforting to know that if litigation is necessary, the same person who drafted an executive contract has the communication skills necessary to persuade a jury that the contract is both valid and fair."

Fred Perpall

"Ex-pats face a lot of challenges, not the least of which is understanding their legal rights in their home country and the foreign country in which they work. When I was in a tough fight for substantial change in control benefits, I hired Rogge. He was willing to work on a contingent fee. We worked together as a team, which enabled me to obtain a fair and just resolution of my dispute. Since then I've hired Rogge on two other occasions to provide me with advice and negotiation assistance on my executive employment contracts."

Glen Camp

"Lawyers are the most demanding type of clients. When lawyers face partnership disputes, they call Rogge. When partners left my law firm, Rogge's creative solutions resolved the dispute quickly and amicably, with minimal attorneys' fees."

John Brusniak

"Rogge is a trusted Wall Street advisor. Rogge has helped relationship managers, investment bankers, branch managers, and executives. When I decided to change firms, I put my trust in Rogge. He is extremely knowledgeable, well-informed and thorough. Rogge facilitated a smooth and amicable transition."

Marc Reinganum, PhD

Testimonials

"For 20 years, I've turned to Rogge to handle significant legal matters. Rogge's nationwide experience with real estate, partnership, REIT and investment matters helps our company avoid legal problems. Rogge understands the big picture and also addresses the details. Rogge is our trusted counselor and litigator."

Tony Dona

"Taking an executive position in a foreign company and working overseas requires the advice of a lawyer who understands the novel and complicated issues involved. Rogge, thanks for making my transition from PepsiCo to Alibaba successful."

Jim Wilkinson

"Rogge, your negotiating strategy and tactics worked to perfection. Remind me to never play poker against you."

Gary Borders

"As a Brazilian citizen working in the U.S. and Brazil, dealing with American legal issues is a scary proposition. When I had a dispute with a broker-dealer, my Brazilian attorneys recommended Rogge. Rogge successfully resolved the issues with my old firm and helped make the transition to my new firm easy. He took the time to explain all of my rights and the pros and cons of my legal options and he partnered well with my Brazilian counsel. Rogge gave me the advice I needed to make the right decisions. And, it was convenient and efficient to have one attorney handle both my departure and my transition."

Edmundo Valente

"Over the last 15 years I've worked with Rogge on several significant legal matters. I trust Rogge. Rogge provides me with proactive and innovative strategies to help the companies and organizations I lead avoid legal troubles. Rogge has been involved in major legal battles in the sports industry from the Coach Mike Leach lawsuit, to NCAA investigations, to the Baylor University Title IX issues."

Woody Norris

"When I received a page in a London airport and learned that my husband had been seriously injured in a wreck in Qatar, it was the most frightening day in my life. We had to get Dutch out of the Middle East to a hospital in Europe on a care flight. I turned to Rogge for help. Rogge was there every step of the way to help my husband and me with Dutch's claims against the oil and gas company that did not provide him safe transportation to the oil field equipment he managed. Rogge, thanks for all of your hard work, understanding the intricacies of an overseas dispute and getting us a fair settlement."

Cindy and Dutch Schorr

"Fifteen years ago our company was sued by a competitor for hiring one of its executives. We needed a tough litigator. A senior partner in a large law firm doing our transactional work recommended Rogge. Rogge defeated the competitor's attempt to enforce its non-compete. Since then, Rogge has been our go-to lawyer for advice and litigation. As one of the county's largest suppliers of loading dock equipment, with offices in 10 states and Canada, we value Rogge's nationwide litigation experience. Rogge is well-connected with lawyers around the country and positions our company to avoid legal problems with his pro-active strategies. Our company is on call for our clients 24/7. I know I can call Rogge day or night and he will make himself available. I often call him at 6 a.m. on my drive into work and he is at his desk. Rogge is the most responsive lawyer I have ever dealt with. Rogge, thanks for 15 years of great advice, pro-active strategies and prompt service. We look forward to working with you and your team for another 15 years."

Vince Sullivan

"Fifteen years ago our company was sued by a competitor for hiring one of its executives. We needed a tough litigator. A senior partner in a large law firm doing our transactional work recommended Rogge. Rogge defeated the competitor's attempt to enforce its non-compete. Since then, Rogge has been our go-to lawyer for advice and litigation. As one of the county's largest suppliers of loading dock equipment, with offices in 10 states and Canada, we value Rogge's nationwide litigation experience. Rogge is well-connected with lawyers around the country and positions our company to avoid legal problems with his pro-active strategies. Our company is on call for our clients 24/7. I know I can call Rogge day or night and he will make himself available. I often call him at 6 a.m. on my drive into work and he is at his desk. Rogge is the most responsive lawyer I have ever dealt with. Rogge, thanks for 15 years of great advice, pro-active strategies and prompt service. We look forward to working with you and your team for another 15 years."

Tim O'Connor

Testimonials

"I have worked with Rogge for 25+ years on significant and complicated cases all across the country. He has helped us enforce arbitration and non-compete agreements and protect our company's intellectual property. His knowledge of the law, trial expertise and common sense have helped us get to the bottom line efficiently."

Jim Herman

"When it came time for me to retire from UBS after 53 years, I wanted a thoughtful departure that took care of my clients and ensured that I received my deferred compensation and trailing commissions. I also needed help to be sure that despite officially retiring, I would have the flexibility to provide consulting services to family offices and private equity firms without violating my non-compete and/or jeopardizing my deferred compensation and trailing commissions. I did my due diligence and hired Rogge Dunn. He has extensive experience helping financial advisors and executives with retirement and severance negotiations. Rogge helped me achieve my goals in short order without exceeding the initial retainer I gave him. Rogge, thank you again for the excellent guidance and support. Your sunny and positive attitude throughout the entire process was a great help."

Joe Liberty

"From his representation of Baylor's Title IX Coordinator, to helping professional athletes and college administrators, Rogge has been involved in numerous legal matters impacting major issues in athletics. Rogge is my trusted legal advisor."

Tom Buning

"Rogge has a well-deserved reputation for successful representation of top brokers across the country. His track record of helping teams negotiate favorable contracts, fight off non-compete lawsuits, stop defamation and win back millions in forfeited deferred compensation is second to none. He has won some of the biggest, hardest fought arbitrations for Barron's top 100 brokers. Rogge knows the brokerage business, which is why so many top broker teams from coast to coast have hired him when they are formulating an exit strategy."

Eric Gershman

"For top producing financial advisors, Rogge is the go-to guy in our industry. His experience and work ethic are unmatched. He is excellent at resolving or avoiding non-compete and non-solicitation disputes."

David Barnes

"We value Rogge's financial industry experience and his practical approach. We trust him for advice and, when necessary, to handle our litigation."

Carl Esrey

"When it came time for me to depart my CEO position, I needed a seasoned attorney who could swiftly navigate a myriad of facts and circumstances and negotiate a win-win exit. Rogge's reputation as a fearsome litigator was paramount to achieving my goals quickly and professionally. When the chips are down, there's nobody I'd trust in my corner more than Rogge."

Brian Clark

"We trust Rogge to advise us on our most challenging employment issues. He provides a trial lawyer's perspective, which helps us reach the right decision. His hard work and his dedication to clients is second to none."

Laura Tornaquindici

"Our employees are ingrained with the attitude that we will be there when the client needs us--24/7/365. When you need a trial lawyer, you need them NOW. Rogge shares our 24/7/365 client service attitude. For 20+ years United Mechanical has trusted Rogge to help us with our legal issues."

David Osborne

"When it came time for me to move on to my next job, I hired Rogge. His reputation for successfully assisting C-Level execs with contract negotiations, severance packages and handling liquidity events is well known among executives and board members. Rogge helped me achieve my goals promptly and cost-effectively."

Mark Heinold

Testimonials

"I trust Rogge. Rogge not only has knowledge of executive contracts, he has the reputation of being a fearsome trial lawyer. I hired Rogge to negotiate my severance package. Rogge enabled me to reach a win/win resolution."

Todd Latouf

"I have worked with Rogge for 20+ years. First as Deputy Executive Director of MADD and then as Executive Director of the Texas PTA. I trust Rogge and regularly seek his advice on legal issues. Rogge is well-known for helping nonprofits navigate the unique legal issues they face. Rogge helps us stay out of trouble and avoid legal disputes and lawsuits. His experience handling legal matters across the country is a plus for organizations who have operations throughout the United States."

Kyle Ward

"When my company forced me to take early retirement, I needed expert legal advice from an attorney experienced in helping clients protect their legal rights regarding departure and deferred compensation. Rogge helped me negotiate a win/win resolution."

James Harris

"As a long-time HR executive, I have worked with a lot of attorneys around the country. Rogge's reputation for helping executives and companies with employment law issues is second to none. Myself and other HR professionals turn to Rogge for advice, negotiation and litigation of employment law matters."

Olivia Wells

"When I needed legal advice, I did my due diligence. Rogge was recommended by numerous FAs and lawyers. Rogge's track record of taking FINRA arbitrations to trial was a hammer the investment bank respected. Rogge listened and, working together, we developed & implemented a successful strategy that achieved my goals in a cost-effective manner."

Monica Perez

"Rogge handles high-profile matters and understands the unique legal issues media personalities face. I trust Rogge. Rogge is not only my lawyer, but my friend."

Al Mack a/k/a "Big Al"

"Thank you for your advice and assistance on a number of matters over the years. Your experience in California, your knowledge of FINRA and your connections in the financial industry helped me successfully resolve my ADA dispute, which was seriously compromising my health. While I understand not all of your clients rely on you to fight for them when their health is on the line, your genuine concern for me as a person, literally saved my life. You were always responsive, regardless of your schedule and your work ethic is amazing. Your tenacity and skills during mediation and arbitration makes you particularly effective. I am eternally grateful!"

Bryan Whang

"I'd like to, once again, thank you and your incredible staff for your representation, assistance and kindness. I truly appreciate your energy and vehemently strong passion. It wasn't about the money; I needed to make a stand against racism for myself and others, which I did with your help. Wishing you the very best Rogge!!!"

LeBrasha Mickles

"Due to a historical anachronism, dozens of licensed Peace Officers working for the City were classified as Park Rangers, instead of Dallas Police Officers. This prevented us from obtaining promotions and other benefits Dallas Police Officers enjoyed. We hired an attorney who filed a class action lawsuit and lost. We were at wits end when we heard about Rogge. He took on our case against all odds, tried a new strategy and obtained a tremendous settlement; not only in terms of money, but winning us the opportunity for promotions and other benefits. On top of that, when the case settled, Rogge reduced his fee. Rogge represents police, active military and first responders. He understands what we go through daily and is totally committed to helping first responders in their time of need. Rogge, I can't thank you enough for your loyalty and dedication to our group and for the great result you obtained."

Nick Novello

"As a former branch manager at UBS, who has worked on capital raises, and now as a Partner in an RIA, I have worked with dozens of attorneys in the financial industry/private equity space. Rogge is widely recognized as one of the best attorneys in this field and an exceptional trial lawyer--if a FINRA arbitration or a lawsuit is necessary. Over the years I have hired Rogge on numerous occasions, including representing a team Goldman Sachs was suing in court that was moving to my firm. And I've hired him to defend a registered representative under investigation by FINRA. When I was wrongfully sued in Louisiana, Rogge found me a Louisiana attorney who got the lawsuit transferred to Houston. Then Rogge went to work. He won an Anti-Slapp ruling awarding me all my attorney's fees against the other side. The case then quickly settled in my favor."

Ray DiNunzio

Testimonials

"Rogge, thank you for your advice and counsel on an important legal issue."

Ryan Moats

"Rogge thank you for being available 24-7. Your spot on legal advice enabled me to strike out the other side. You came highly recommended from several industry sources and you lived up to your reputation. Your track record with sports industry issues makes you an MVP. When I face legal issues I want you on my team."

Chris Holt

"Companies and PE firms need to make a stand to protect their trade secrets and enforce their non-competes. With businesses worth \$500 million in our portfolio, we take buying and selling insurance agencies very seriously. When a large company hired away key employees and utilized the trade secrets belonging to one of our portfolio companies, we needed quick action. I hired a local attorney who did not produce results. I imported Rogge from Dallas and before long he was able to obtain a very favorable settlement."

Ken Kirk

"I got to know Rogge when he was my Executive MBA Professor at SMU. He is popular with students and one of the top-rated professors in the program. His class involves an interactive exchange of ideas and he puts so much effort into making sure that his students understand complex legal topics. I've worked with many lawyers across the U.S and Europe. Rogge gets the business perspective on legal issues and really partners with you to understand what you're trying to achieve, and how to get there in an agile, but rationale, way. Rogge helps our company find common sense, business solutions to difficult and challenging legal issues. He and his firm have become our trusted partner."

Lisa Nelson

"We've been in business for 69, the last 40+ on Plano Road. A city Councilman and residents in his district petitioned the City of Dallas to re-name Plano Road to North Lake Highlands Drive. The name change would have caused tremendous confusion among our customers and required us to provide notice of a new billing address on hundreds of construction contracts around Texas. We needed fast action. Rogge coordinated our legal and grass roots lobbying efforts. Our company along with an assisted living facility and other local businesses became an organized force that the City had to reckon with. Thanks to Rogge's leadership, strategic planning and grassroots tactics, the Dallas City Planning Commission unanimously defeated the name change. We protected our brand and saved tens of thousands of dollars in business expenses. Rogge has represented United Mechanical for more than 20 years. We turn to him for advice on a variety of matters. Like our company, he is available to help at all hours of the day and night."

Brian Chester

"When I complained to HR about my boss bullying me, I was fired soon thereafter, allegedly for poor performance. I was devastated. I almost lost my house, I lost my insurance and I had to cash in my 401(k) to live. The stress was so bad I developed a stuttering problem for the only time my life, which made it hard to find a job. No attorney would help me and I had nowhere to turn. I read about Rogge and asked him to take a chance on me. Rogge took my case on a pure contingent fee paying for everything, even though it was a long, tough fight against wealthy doctors. Rogge stuck by me when I turned down a six-figure settlement offer. We went to trial and won a \$1,060,000 verdict. While I appreciated the money, holding my bosses accountable and having a jury finding that I was bullied and wrongfully discharged was worth much more. Both Rogge and I were in tears when the verdict was read. I went back to school, completing my RN and I am now making more money in a wonderful job. Rogge thank you, Josh and your tremendous team for sticking with me through thick and thin and never once wavering in your total support of me and my case. I will be forever grateful for the help."

Patty Hahn

"I got to know Rogge the hard way, when I was CEO of Pizza Inn and he was suing our company over a change in control lawsuit I inherited. Rogge's tenacious, bulldog approach impressed me then. Later, I twice hired him to help me with various C-level legal issues. Rogge's extensive experience handling major issues for franchisors and entrepreneurs is invaluable; his restaurant experience is a plus. Every CEO, entrepreneur and business owner needs someone like Rogge in their corner. I have never hesitated to recommend Rogge to other C-level execs."

Tim Taft

"I got to know Rogge early in his career when I was opposing counsel in an Austin lawsuit. Rogge impressed me then as someone who creative, hardworking and dedicated to his clients. Years later we were on opposite sides of a significant case involving invasion of privacy where Rogge obtained a good result for his clients. If my firm needed a lawyer to defend it, I would hire Rogge."

Jim Ewbank

Testimonials

"Helping relationship managers move firms requires careful consideration of promissory notes, deferred comp, non-competes, TROs and the Protocol for Broker Recruiting. As a former branch manager for UBS and now as a placement specialist, I've seen a number of attorneys assisting relationship managers. Rogge's experience and knowledge in this space makes him the best choice for teams who are transitioning. Not only does he give good advice, but when necessary, he is fearsome litigator who has successfully taken on the big wire houses and investment banks."

Chris Miller

"I've worked closely with Rogge on numerous significant litigation matters for 15+ years. He defended me in deposition and I've seen him in action. His attention to detail, energy and enthusiasm is second to none. He is knowledgeable about the law, but most important, he is 'street smart,' which enables him to relate to our employees and connect with a jury."

Paul Avery

"A former employer tried to obtain a Temporary Restraining Order against me with 6 hours notice, I needed help fast. Multiple bankers recommended Rogge. Oldco tried to prevent me from doing business with my long-time clients. Rogge stopped them dead in their tracks. Once they lost the TRO, they lost any momentum and Rogge negotiated a great settlement. Rogge, thanks for your help, courtroom win and your reasonable bills.

Rogge is a seasoned trial lawyer with strong negotiation tactics, who goes above and beyond to ensure that his clients are represented with the utmost care and security that will yield the best possible outcome for his clients. Rogge is a 'pit bull' and Rogge Dunn Group is a force to be reckoned with. I could go on and on, but don't want to take up the entire page."

Dustin Lamb

"Rogge Dunn has always been extremely helpful and 100% honorable in all my interactions with him, and with the advice he has given me through the years."

Glenn Taylor

"For many years I've hired Rogge for advice and counsel on legal issues. His Firm's creativity and 'outside the box' ideas are a valuable tool that helps us avoid litigation. The Rogge Dunn Group has a stable of thoroughbred lawyers I can rely on."

Stephen Rizzieri, Esq.

"Whether it's helping with an exit strategy, negotiating an executive employment agreement with a new firm, or fighting off a non-compete, Rogge and his Firm is a C-Level Executive's most valuable asset."

Joe Luongo

"For 20 years I've had the pleasure of working with Rogge and seeing him in action at trials, mock trials and depositions. Rogge is a creative thinker with street smarts. Rogge and the Rogge Dunn Group are our trusted legal resource."

Blaise Hadley

"Every restaurateur's worst nightmare is the murder of their employees. When two former employees robbed and killed three Outback Steakhouse employees in East Texas, we needed an accomplished trial lawyer who understood our culture and could connect with our employees. We chose Rogge. Outback has always used every security technique to provide a safe workplace. Rogge vindicated Outback's approach to security and got the plaintiffs' cases dismissed in their entirety on a summary judgment motion."

Blaise Hadley

"Rogge's reputation in the sports industry space is well-known. He is a people person. He knows how to deftly work behind the scenes without publicity to help his clients; but, if necessary, how to take a high-profile case to trial."

Kris Lowe

"When I had a dispute over compensation and management issues in our medical practice group, I hired Rogge. I had an uphill battle because the group was owned a multi-billion dollar health care conglomerate. I couldn't see any light at the end of the tunnel and only stress for an extended period. During a time of great personal strife, Rogge helped me negotiate a favorable exit that provided personal and financial relief, while discounting his fees. Rogge, thank you for being more than a lawyer---a friend and a confidante. I still remember your words during a tough moment 'I don't abandon my clients.'

Hariprasad Trivedi, M.D.

"When I earned my Executive MBA at SMU, Rogge was one of my best professors. As a successful trial attorney, Rogge made business law come alive."

Doug Renfro

EXHIBIT D



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(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

ROGGE DUNN

BOARD CERTIFIED
TEXAS BD. OF LEGAL SPECIALIZATION:
• CIVIL TRIAL LAW
• LABOR & EMPLOYMENT LAW

WRITER'S DIRECT DIAL: (214) 220-0077

WRITER'S E-MAIL: DUNN@RESTAURANTLAW.COM

July 19, 2019

CONFIDENTIAL
ATTORNEY WORK PRODUCT
ATTORNEY-CLIENT COMMUNICATION

Scott Crane
6404 Drawbridge Lane
Plano, TX 75024

- ☐ **VIA OVERNIGHT**
- ☐ **VIA HAND DELIVERY**
- ☐ **VIA FIRST CLASS MAIL**
- ☐ **VIA FAX:**
- ☐ **VIA E-MAIL: SCRANE73@GMAIL.COM**
- ☐ **VIA CERTIFIED MAIL RRR:**

Re: **Our File No.** TBA
Our File Name: Crane/Rave

Dear Scott:

FULLY EXECUTED REPRESENTATION AGREEMENT

Enclosed is the fully executed representation agreement.

TIPS FOR SUCCESSFUL RESOLUTION OF YOUR LEGAL MATTER

To put ourselves in the best position to win your legal matter, we need to work together as a team. In 25+ years of legal battles, I have learned approaches that give my clients the best chance to succeed. I have developed what I respectfully call the "Commandments" for the successful handling of your legal matter.

DO NOT POINT OUT YOUR OPPONENT'S MISTAKES

Your opponent may make mistakes such as not sending you a K-1, earnings reports or denying you access to books and records.

Rave Restaurant (hereinafter the "Company") may not send you a COBRA notice, not pay you for unused vacation/PTO time or fail to reimburse you for travel, entertainment or other business expenses. **IMPORTANT:** Do not inform the Company that you have not been reimbursed for business expenses, not received COBRA notice or that your insurance/medical expenses have been declined, etc., etc.

Under no circumstances should you or anyone else point out their mistakes to them at this time. The failure to make payments due and owing to you may entitle you to recovery of your attorneys' fees and/or statutory damages.

Your opponent's mistakes should be revealed only by me at the appropriate time--which will give you the best negotiating/settlement leverage.

THE "COMMANDMENTS"

Enclosed for your careful review are the "Commandments." Following these guidelines ensures efficiency--which gives us a better chance of achieving your goals.

For example, it is important that you always refer to your case name **Crane/Rave** on the subject line of all e-mails and other correspondence. At times I will review or organize your past e-mails and/or forward them to other members of my legal team who will be working on your matter.

If you always put **Crane/Rave** on the subject line, this will enable us to efficiently forward, sort, word search and file your e-mails.

Although we have discussed some of the Commandments in the past, I thought it would be helpful for you to have them in writing. Please review them from time to time.

THE BEST WAY TO REACH ME

The best way to reach me is to call my direct office line, 214-220-0077, and leave a voice mail. After that please e-mail me. The third option is to call me on my cell, 214-356-6666. My cell does not get good reception during the day up here on the 19th floor, so use my cell as a last resort.

DO NOT SEND US TEXTS

Do not send me texts. (No one watches my texts).

COPY THE PARALEGAL ASSIGNED TO YOUR MATTER

Always copy Melanie, my paralegal, on all emails. She will often accomplish tasks on your matters herself. And, she watches my emails, which helps speed up my response time.

“DON’T BLAB” ABOUT YOUR LEGAL MATTER

You gain nothing by talking about your dispute with others and risk ruining our strategy and tactics. If you need to talk to others about your case, please call me first.

SOCIAL MEDIA

Remove anything inappropriate, political, religious, or racial from your social media. Do not make posts or tweets that have anything to do with your legal issues. “*Lock down*” your *social media* so only your family and very close friends can access it.

METHOD OF OUR COMMUNICATIONS

U.S. Mail, FedEx and courier packages have been stolen; the computers and emails of the U.S. military, foreign governments and *Fortune* 100 companies like Sony have been hacked; telephone conversations and faxes have been intercepted and/or recorded.

In short, there is no foolproof way to ensure that communications between an attorney and client cannot be intercepted, stolen and/or duplicated.

We predominantly use email to transmit our communications and bills to you. If you prefer a different type of transmission, please notify us in writing; and, we can discuss your preferences.

Since all communications are subject to being intercepted, you should be extremely careful what you say in and attach to emails you send us. There is also the danger someone is inadvertently cc’d on an email and the risk of the proverbial “whoops, and then I hit reply all” incident and someone unintentionally sends a mass distribution of information or documents they don’t want the other side to see.

If this ever occurs, please notify us immediately! Often the law permits us to contact the other side and demand they return or destroy all inadvertently produced emails or documents.

SLOW BILLING CYCLE

We always focus our primary energy on the legal issues and work that needs to be done to help our clients. I am not the kind of attorney who sits down on the second day of each month and focuses on sending out bills for attorney’s fees and expenses or bills for only expenses (if we are representing you on a contingent fee).

I've found that concentrating first on the legal work that needs to be done for my clients and worrying about sending out bills later, generates better results for my clients. Thus, bills may not be sent to you until 65 or more days after the close of a month. Most of my clients enjoy this "float." However, if you prefer to receive bills soon after the end of the month, please notify me in writing of that preference.

As soon as there are any developments, I will contact you. In the meantime, if you have any questions, comments or instructions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Rogge Dunn', is written over a long, horizontal, slightly wavy line that serves as a baseline for the signature.

Rogge Dunn

RRD/dl

Enclosure

cc: w/enc. w/o enc. no enc. Tina Vanderburg, Paralegal (our office)
cc: w/enc. w/o enc. no enc. Melanie White, Paralegal (our office)
cc: w/enc. w/o enc. no enc. Billing Clerk
cc: w/enc. w/o enc. no enc. Filing Clerk
cc: w/enc. w/o enc. no enc. RRD Work Files
cc: w/enc. w/o enc. no enc. CDB

Scope of Hourly Limited Representation Agreement for Company

J. J. 17-19

Rogge Dunn and Rogge Dunn Group, PC (hereinafter collectively the "Firm") is representing Scott Crane (hereinafter "You" or "Your"), individually, in Your individual capacity only, in a representation limited to: severance negotiations (hereinafter "the Assignment"). The Firm and You hereinafter collectively the "Parties." The Firm is not representing any trusts, partnerships, joint venturers, corporate entities or Your: partners, family, agents, or affiliated persons or entities. The Firm is not representing You in any other matters. The Firm's representation shall be strictly limited to the Assignment and providing only services of a purely legal nature. The Firm has no duty to represent You in any matters other than the Assignment including, but not limited to, claims that could be brought by or against You regarding any other matter. The Firm is not representing You or advising You in any insurance dispute or regarding any: tax; business; investment; accounting; family law; bankruptcy; debtor's/creditor's rights; financial planning; debt or judgment collection work; or appeals/appellate matters. Should You wish to retain the Firm beyond the Assignment, the Parties must sign a new, written agreement and You will pay an additional, very substantial retainer.

This contract is hereinafter "this Agreement." The Texas Disciplinary Rules of Professional Conduct (hereinafter the "TDR") shall control, to the exclusion of any other "ethics codes," to the extent that any ethical rules govern the Parties' rights and obligations. The Firm's obligations shall be governed by the TDR, even if it works in another state or federal court. The Firm is licensed to practice law only in Texas.

Attorneys' Fees and Litigation Expenses

The billing rates this year for the attorneys who might become involved will be:

\$1,000/hr for Rogge Dunn;

Josh Iaccone \$695

\$625 to \$850/hr for other the Firm Partners;

\$350 to \$475/hr for other non-partner attorneys with the Firm;

\$200/hr for law clerks;

\$195/hr for paralegals.

You promise to pay the Firm's hourly attorneys' fees, plus Litigation Expenses. We bill in tenths of an hour with a .10 minimum rounded to the nearest tenth of an hour. If 1, 2 or 3 minutes are spent on a task, we bill .10. If 10 or 14 minutes are spent on a task, we bill .20. Each January, we will raise the hourly rates we charge You by approximately 10% percent. To reduce Your attorneys' fees, where appropriate, we use attorneys and paralegals with lower billing rates. Paralegals and support personnel do routine tasks such as reviewing and organizing documents/data or clerical work not requiring an attorney's attention. Paralegals may do legal work supervised by an attorney. The Firm may use contract attorneys who are not the Firm employees to work on the Assignment. You will be charged for their work in an amount greater than what the Firm pays them as we incur the costs of locating, insuring and/or otherwise retaining them. If You want more specific information, You agree to write the Firm. We strongly believe that peer discussion and review is important in providing quality services so discussions between the Firm lawyers regarding this Assignment will occur and will be billed.

7.17.19. J

The claims or causes of action You assert if the Assignment proceeds to a lawsuit/arbitration may involve laws that award attorney's fees to the winner of the litigation. If possible, the Firm will seek recovery of attorneys' fees from Defendant(s) as part of Your claims. However, a jury/judge/arbitrator may not award You any attorney's fees or award a reduced amount. Even if You are not awarded any attorneys' fees, You still promise to pay the Firm for its attorney's fees as set out in this Agreement. Of course, any attorney's fees awarded to You against Defendant(s) belong to You, not the Firm.

Expenses will be incurred to handle the Assignment. It is difficult for the Firm to predict accurately the amount and type of expenses for this case. Some of these are for: court filings; service and subpoenas; court reporters; videographers; investigators; travel and lodging; consultants; experts; focus groups; mock trials; computer research; long distance roaming; SAT phone; postage; photocopying; and exhibits for mediation, focus groups and trial or arbitration (hereinafter collectively the "Litigation Expenses").

We do not charge for the Firm's staff's overtime or faxes, including long distance faxes. We charge \$.13 for copies and what the Firm is billed for/by: FedEx, mock trials, experts, exhibit makers, mediators, court reporters, videographers, private investigators, process servers, couriers and other vendors. We do not charge for long distance/cell calls, except for out-of-country calls and roaming fees. If copy services, hotels or vendors handle faxes/copies, You will be charged only what they bill the Firm and for courier fees. Our flat-rate billing with Westlaw reduces computer research charges. We pass this savings on via pro rata billing for same.

Deposit/Retainer Required to Begin Representation

To start the Assignment, we require a \$10,000 initial deposit/retainer. We do not promise to handle the Assignment for the amount of the retainer. Your attorneys' fees and Litigation Expenses could easily far exceed the retainer. Retainers are deposited in our escrow account and neither You nor the Firm earn interest on same. You authorize the Firm to bill You or make an immediate withdrawal from retainers for attorneys' fees and Litigation Expenses as incurred. We will send You a letter detailing the withdrawal. If You have questions, or believe attorneys' fees or Litigation Expenses are too high, You promise to notify the Firm in writing within 15 days so together we can evaluate whether they might be reduced in the future. If You don't, we assume You approve of the withdrawal and the Firm's handling of the Assignment. The Firm may require additional retainers of two times the amount: of the initial retainer, any the Firm bill or higher retainer amounts to cover anticipated attorneys' fees and Litigation Expenses, the Firm may hold any existing retainer and instead bill You approximately every 30 days. Ninety days before the date the trial or arbitration hearing is scheduled, You agree to pay an additional very large retainer to cover expected attorneys' fees and Litigation Expenses for said trial/hearing. the Firm will also send You vendors' bills for You to pay directly to the vendors. You agree to pay vendors bills and bills from the Firm for attorneys' fees and Litigation Expenses upon receipt, even if You have paid a substantial retainer.

Any Unused Portion of Deposit/Retainer Will be Refunded

Approximately 60 days after written confirmation that the Firm's representation has ended, the Firm will provide You with a final accounting. This gives the Firm time to receive all bills from vendors before preparing Your final bill. **At that time, any unused retainer will be refunded.**

Termination of Representation

The Parties are free to end their relationship at any time. Our relationship automatically ends upon written notice or the end of the Assignment. The Firm informing You of legal news does not create an attorney-client relationship or require us to send You legal news. If You breach this Agreement, if any requested retainer or bill remains unpaid after 15 days, the additional trial retainer is not paid 90 days before trial/arbitration hearing, or the TDR permits or requires the Lawyers to withdraw, You agree that the Firm is relieved from doing any further work and has the absolute right to withdraw immediately from representing You and You will not oppose said withdrawal. If the Firm withdraws, it will give written notice, and upon reasonable notice will return Your papers and property and be owed all attorneys' fees and Litigation Expenses up to the time of its withdrawal. The Firm has no duty to find You other attorneys if it withdraws.

Estimates Regarding Attorneys' Fees and Litigation Expenses

The Firm may have given or in the future, upon request, may give attorneys' fees or Litigation Expenses estimates. Attorneys' fees and Litigation Expenses are difficult to predict and are a function of many factors over which the Firm has little control, such as the opposition's tactics. All estimates are subject to variation and are not a maximum or fixed amount.

OPINIONS AND OUTCOME NOT GUARANTEED, DISCLAIMER OF WARRANTIES

Any opinions concerning the Assignment or legal issues are expressions of our judgment, not guarantees. How a judge, jury or arbitrator views the law or facts are variables subject to the vagaries of human nature beyond our control. The Firm makes no guarantee as to any outcome or a favorable result. The Firm's past victories or achievements are no guarantee they can be duplicated in the Assignment. Results depend on the facts of each case. A trial/arbitration is an unpredictable event, the outcome of which may be based upon facts we do not know at this time and on law that may be unclear, uncertain or change over time.

The Firm makes no assurances, representations, guarantees or warranties that it can obtain a particular result or outcome for You. **THE LAWYERS DISCLAIM ANY SUCH WARRANTIES.** You agree that the Firm's analysis and opinions are not a guarantee of any kind.

Your Cooperation and Communication is Critical

Unfortunately, the legal process is long and laborious and includes a number of frustrating delays and continuances. The best way to maximize Your situation and protect Your interests is by a team effort, which requires substantial help, effort and cooperation by You. Promptly providing a typed chronology, documents, e-mails, and answers to our questions gives us the best chance to speed up the process and minimize the delays inherent in litigation. You promise to maintain copies of all documents and electronic data You send to the Firm.

If You ever have any questions, comments or instructions or believe the Firm is not meeting Your expectations, in any respect, You promise to send Dunn a letter specifying all of

Your complaints, concerns or issues. You shall provide written notice of any change in Your address, phone and fax numbers, and/or e-mail address within 15 days of a change.

**NO PRIOR PROMISES OR REPRESENTATIONS,
EXCEPT THOSE SPECIFICALLY STATED IN THIS AGREEMENT**

The Parties promise and represent that no representations, promises, statements, review of materials or a website, presentations or agreements not specifically stated in this Agreement have been made that caused them or motivated them to sign this Agreement. You promise and represent that **YOU ARE RELYING ON YOUR OWN JUDGMENT** after You had ample opportunity to consult with an independent attorney to advise You regarding the advisability of signing this Agreement. You promise to carefully review and consider this Agreement and represent that nothing that has been said in any discussions between the Parties or any other person or entity prior to signing this Agreement that is motivating You to sign this Agreement, except what is specifically contained herein. This Agreement states the entire agreement between the Parties and supercedes any prior oral or written agreements. This Agreement can be amended only by a notarized writing, signed by the Parties.

Dispute Resolution Procedures

If any dispute arises among the Parties, the Parties agree that prior to filing a lawsuit the Parties must participate in a full-day mediation in Dallas, Texas with the mediator's fee split 50/50 between You and the Firm. The party asserting a claim or dispute must send the other party(ies) a written demand for mediation (hereinafter the "Demand"). If You make the Demand, You will specify in the Demand one of the following three mediation groups: Burdin Mediations, Dispute Mediation Service or Gilbert Mediation Group (hereinafter collectively the "Mediation Group") that will select a mediator. If the Firm makes the Demand, within seven days of receipt You must designate in writing the Mediation Group to be used to select the mediator.

If a) the Parties have not set a date certain in writing to attend mediation within 45 days of any party making a Demand; b) or any party has not selected one of the Mediation Group within seven days; c) is not cooperating to schedule mediation; or d) is otherwise not following the dispute resolution procedures herein (hereinafter the "DRP"), the other party(ies) shall have the right to file a lawsuit to compel strict compliance with the DRP and the judge is granted authority to require specific performance with the DRP. The party(ies) required to file a lawsuit to compel compliance with the DRP shall recover all reasonable and necessary attorneys' fees incurred to prosecute said lawsuit.

Sole, Mandatory Jurisdiction, Venue and Law Governing All Disputes

This Agreement shall be governed by, construed, interpreted and enforced in accordance with and subject to the laws of the State of Texas without regard to any conflicts of law rules or principles. If a dispute arises, the Parties agree to the sole, exclusive and mandatory jurisdiction and venue in the state and federal courts of Dallas County, Texas. The Parties waive and agree not to raise or plead any defense of forum non conveniens or that Dallas County, Texas is an inconvenient, improper or incorrect place for venue or disputes to be heard.

Miscellaneous

If a provision of this Agreement is or may be held invalid, void, or unenforceable, the Parties want a court to use the blue pencil procedure to reform or revise any such provision to, if possible, make it enforceable. Even if one or more provisions are totally struck from this Agreement, the Parties want the remaining provisions to survive and continue in full force and effect without being impaired or invalidated. And, the Parties want the surviving provisions of this Agreement enforced to the fullest extent permitted by law. Sending a demand letter or entering into negotiations may cause withdrawal of previous settlement offers, if any. The Firm cannot advise You regarding pros and cons of entering into this Agreement. Other qualified attorneys could handle the Assignment and would charge You less. This Agreement is effective upon all Parties' signatures and can be executed in identical counterparts and via fax or email.

THE PARTIES WAIVE THEIR RIGHTS TO A JURY TRIAL

THE PARTIES WAIVE THEIR FUNDAMENTAL, CONSTITUTIONAL RIGHTS TO A JURY TRIAL REGARDING ANY DISPUTES AGAINST ONE ANOTHER. ALL DISPUTES SHALL BE DECIDED BEFORE A JUDGE WITHOUT A JURY. THE PARTIES WANT ALL DISPUTES BETWEEN OR AMONG THEM EXCLUSIVELY DECIDED BY A FEDERAL OR STATE COURT JUDGE OF A COURT HAVING JURISDICTION OVER THE PARTIES, SITTING WITHOUT A JURY. THIS INCLUDES, BUT IS NOT LIMITED TO, ANY AND ALL LAWSUITS, CLAIMS, COUNTERCLAIMS, AND DISPUTES ARISING UNDER, OUT OF OR RELATED TO THIS AGREEMENT, NON-PAYMENT OF ATTORNEYS' FEES AND/OR LITIGATION EXPENSES, THE LAWYERS' REPRESENTATION OF YOU AND ANY CLAIMS FOR MALPRACTICE, NEGLIGENCE, BREACH OF: FIDUCIARY DUTY, WARRANTY OR CONTRACT OR ANY OTHER CLAIMS THE PARTIES MIGHT ASSERT AGAINST ONE ANOTHER. THE PARTIES INTEND THIS JURY WAIVER AGREEMENT TO BE AS BROAD AS POSSIBLE.

THE PARTIES IRREVOCABLY WAIVE THEIR RIGHTS TO A JURY TRIAL. NONE OF THE PARTIES HAVE MADE OR RELIED ON ANY ORAL REPRESENTATIONS TO OR BY ANY OTHER PARTY REGARDING THE PROS AND CONS OR ENFORCEABILITY OF THIS PROVISION. EACH PARTY HAS READ AND PROMISES THEY UNDERSTAND THIS JURY WAIVER.

CAUTION: YOU NEED NOT AGREE TO THIS PROVISION. OTHER ATTORNEYS MAY BE WILLING TO REPRESENT YOU WITHOUT THIS PROVISION. THE FIRM WILL NOT ADVISE YOU ON THIS ISSUE. YOU SHOULD OBTAIN THE ADVICE OF A DIFFERENT ATTORNEY BEFORE AGREEING TO THIS PROVISION.

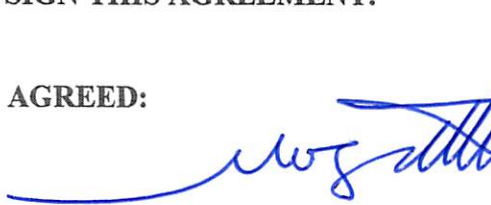
Take Your Time Before Signing

TAKE YOUR TIME AND READ THIS CONTRACT CAREFULLY. CONSIDER YOUR OPTIONS. THE FIRM CANNOT ADVISE YOU REGARDING WHETHER OR NOT IT IS IN YOUR BEST INTEREST TO HAVE THE FIRM REPRESENT YOU ON AN HOURLY BASIS, A CONTINGENT BASIS OR A HYBRID BASIS. YOU SHOULD SEEK THE ADVICE OF A DIFFERENT ATTORNEY REGARDING THE ADVISABILITY OF YOU SIGNING THIS AGREEMENT OR ANY ALTERNATIVE AGREEMENT YOU MIGHT BE ABLE TO OBTAIN WITH THE FIRM OR ANOTHER ATTORNEY.

THE FIRM DOES NOT PROMISE OR GUARANTEE IT WILL WIN ANY MONEY FOR YOU, DEFEAT CLAIMS ASSERTED AGAINST YOU OR WIN YOUR CASE.

IF YOU DO NOT UNDERSTAND ALL OF THIS AGREEMENT, OR IT DOES NOT CONTAIN ALL AGREEMENTS BETWEEN YOU AND THE FIRM, DO NOT SIGN THIS AGREEMENT.

AGREED:



Rogge Dunn, Individually

ROGGE DUNN GROUP, PC



By: Rogge Dunn

Its: Partner

7/17/19

(Date)

AGREED:



Client, Individually

SCOTT CRANE

Client's Printed Name

7.15.19

(Date)

Client, Individually

Client's Printed Name

(Date)

AGREED:

THE “19 COMMANDMENTS”

For The Successful Handling of Your Employment Matter[©]

1. Keep quiet - - “Loose lips sink ships”

- No Facebook postings or Tweets about your dispute
- Revealing any “aces up our sleeve” or strategy destroys our ability to surprise your opponent

2. Make sure your Facebook and social media pages are very professional

- Your Facebook, LinkedIn and social networking postings will be shown to the jury
- Do not discuss your dispute or claim on your Facebook, Twitter or anybody else’s Facebook/Twitter

3. Never use any company computers, PDA’s, cell phones, or iPads to communicate with us

- This waives our attorney/client privilege and enables your opponent to get copies of our communications
- Do not send us text messages from a company cell phone
- Only use your personal e-mail account and a computer/iPad/cell phone that is a personal device you own!!!
- Warning: If you send an e-mail from your personal e-mail account on a company device the Company can obtain that e-mail!!!

4. Don’t do anything regarding your legal matter without talking to us first

- Do not communicate with your opponent or witnesses (or even invite them to lunch)
- Do not communicate with any of our experts or investigators
- Do not take any actions that relate to your legal matter
- Do not settle, offer to settle or enter into negotiations

- Executing a successful game plan requires you consulting with us and considering all strategic options before you take any action

5. If your adversary or a witness calls you

- Listen and take notes, but do not volunteer any information
- Then call us immediately to determine whether you should document the call

6. Do Not Point Out Your Adversaries' Mistakes

- The Company may make mistakes such as not sending you a COBRA notice, not paying you for unused vacation/PTO time or fail to reimburse you for travel and entertainment expenses
- **IMPORTANT:** Do not inform the Company that you have not received a COBRA notice or your insurance/medical expenses have been declined
- **Under** no circumstances should you or anyone else point out their mistakes to them at this time. The Company's failure to make payments due and owing to you may entitle you to recovery of your attorneys' fees and/or other statutory damages
- The Company's mistakes should be revealed only by me at the appropriate time -- which will give you the best negotiating/settlement leverage

7. VOICE MAILS

- Do not leave any voice mails to your opponent other than I am returning your call
- If your opponent leaves you a voice mail, make a recording of it and save it...do not delete any voice mails you received

8. Always keep a copy of anything you send us

- This is more efficient and saves you money
- This ensures you have the copies with you that we may need to discuss

9. Please prepare and update a chronology and timeline of key events

- This ensures precise communication and saves you attorneys' fees
- Tell us everything, together we will decide what is important

10. Communicate promptly if you have any new info, ideas, questions or suggestions

- If we do not promptly respond to you, send Rogge a reminder e-mail and voicemail and contact one of our attorneys or paralegals assigned to your matter.

11. The best way to reach us is by e-mail

- Paralegals watch our e-mails, so e-mails are faster than sending us texts

12. Always refer to your case name in the re: line of all e-mails

- This ensures efficient sorting and filing of all e-mails
- The re: line for your case is Crane/Rave Restaurant

13. Do NOT take or receive any company property

- Do not take client lists, cost/pricing data
- Do not ask others to send you copies of documents or company property

14. Do NOT download, send or delete anything from the company computer!!!

- We may want you to print out a few key e-mails – ask first
- Do not “clean out” e-mails, texts, files etc. prior to leaving

15. Do NOT throw away or destroy any documents, files or evidence in any way related to your legal matters

- Save all documents and evidence

- Do not delete anything from your phone, PDA, laptop or computer

16. Do NOT tape record anyone!!!

17. Do NOT get witnesses to send letters or write summaries about what happened

18. Always cc Rogge and all Attorneys and the Paralegal assigned to your matter

- This enables anyone on the RDG team to respond promptly by a reply all e-mail
- It speeds up the response time by one of the RDG Team members

19. Electronic Delivery of Documents is Best Practices

- Scan and email us documents, or upload electronic files into a DropBox

EXHIBIT E



500 N. AKARD ST., SUITE 1900
DALLAS, TEXAS 75201-6629
(214) 888-5000 • FAX (214) 220-3833

TRIAL ATTORNEYS

ROGGE DUNN

BOARD CERTIFIED
TEXAS BD. OF LEGAL SPECIALIZATION:

* CIVIL TRIAL LAW
* LABOR & EMPLOYMENT LAW

WRITER'S DIRECT DIAL: (214) 220-0077

WRITER'S E-MAIL: dunn@righttowork.com

August 27, 2019

**CONFIDENTIAL
ATTORNEY WORK PRODUCT
ATTORNEY-CLIENT COMMUNICATION**

Scott Crane
6404 Drawbridge Lane
Plano, Texas 75024

- ☐ VIA OVERNIGHT
- ☐ VIA HAND DELIVERY
- ☐ VIA FIRST CLASS MAIL
- ☐ VIA FAX:
- ☒ VIA E-MAIL: scrane73@gmail.com
- ☐ VIA CERTIFIED MAIL RRR:

Re: **Our File No.** TBA
Our File Name: Crane/Rave

Dear Scott:

FULLY EXECUTED REPRESENTATION AGREEMENT

Now that more than 24 hours have passed since you signed the representation agreement, I am sending you the **enclosed** fully executed representation agreement.

TIPS FOR SUCCESSFUL RESOLUTION OF YOUR LEGAL MATTER

To put ourselves in the best position to win your legal matter, we need to work together as a team. In 25+ years of legal battles, I have learned approaches that give my clients the best chance to succeed. I have developed what I respectfully call the "Commandments" for the successful handling of your legal matter.

DO NOT POINT OUT YOUR OPPONENT'S MISTAKES

Your opponent may make mistakes such as not sending you a K-1, earnings reports or denying you access to books and records.

Rave Restaurant Group (hereinafter the "Company") may not send you a COBRA notice, not pay you for unused vacation/PTO time or fail to reimburse you for travel, entertainment or other business expenses. **IMPORTANT:** Do not inform the Company that you have not been reimbursed for business expenses, not received COBRA notice or that your insurance/medical expenses have been declined, etc., etc.

Under no circumstances should you or anyone else point out their mistakes to them at this time. The failure to make payments due and owing to you may entitle you to recovery of your attorneys' fees and/or statutory damages.

Your opponent's mistakes should be revealed only by me at the appropriate time--which will give you the best negotiating/settlement leverage.

THE "COMMANDMENTS"

Enclosed for your careful review are the "Commandments." Following these guidelines ensures efficiency--which gives us a better chance of achieving your goals.

For example, it is important that you always refer to your case name Crane/Rave on the subject line of all e-mails and other correspondence. At times I will review or organize your past e-mails and/or forward them to other members of my legal team who will be working on your matter.

If you always put Crane/Rave on the subject line, this will enable us to efficiently forward, sort, word search and file your e-mails.

Although we have discussed some of the Commandments in the past, I thought it would be helpful for you to have them in writing. Please review them from time to time.

THE BEST WAY TO REACH ME

The best way to reach me is to call my direct office line, 214-220-0077, and leave a voice mail. After that please e-mail me. The third option is to call me on my cell, 214-356-6666. My cell does not get good reception during the day up here on the 19th floor, so use my cell as a last resort.

DO NOT SEND US TEXTS

Do not send me texts. (No one watches my texts).

COPY THE PARALEGAL ASSIGNED TO YOUR MATTER

Always copy Connye, my paralegal, on all emails. She will often accomplish tasks on your matters herself. And, she watches my emails, which helps speed up my response time.

“DON’T BLAB” ABOUT YOUR LEGAL MATTER

You gain nothing by talking about your dispute with others and risk ruining our strategy and tactics. If you need to talk to others about your case, please call me first.

SOCIAL MEDIA

Remove anything inappropriate, political, religious, or racial from your social media. Do not make posts or tweets that have anything to do with your legal issues. ***“Lock down”*** your ***social media*** so only your family and very close friends can access it.

METHOD OF OUR COMMUNICATIONS

U.S. Mail, FedEx and courier packages have been stolen; the computers and emails of the U.S. military, foreign governments and *Fortune* 100 companies like Sony have been hacked; telephone conversations and faxes have been intercepted and/or recorded.

In short, there is no foolproof way to ensure that communications between an attorney and client cannot be intercepted, stolen and/or duplicated.

We predominantly use email to transmit our communications and bills to you. If you prefer a different type of transmission, please notify us in writing; and, we can discuss your preferences.

Since all communications are subject to being intercepted, you should be extremely careful what you say in and attach to emails you send us. There is also the danger someone is inadvertently cc’d on an email and the risk of the proverbial “whoops, and then I hit reply all” incident and someone unintentionally sends a mass distribution of information or documents they don’t want the other side to see.

If this ever occurs, please notify us immediately! Often the law permits us to contact the other side and demand they return or destroy all inadvertently produced emails or documents.

SLOW BILLING CYCLE

We always focus our primary energy on the legal issues and work that needs to be done to help our clients. I am not the kind of attorney who sits down on the second day of each month and focuses on sending out bills for attorney’s fees and expenses or bills for only expenses (if we are representing you on a contingent fee).

I've found that concentrating first on the legal work that needs to be done for my clients and worrying about sending out bills later, generates better results for my clients. Thus, bills may not be sent to you until 65 or more days after the close of a month. Most of my clients enjoy this "float." However, if you prefer to receive bills soon after the end of the month, please notify me in writing of that preference.

As soon as there are any developments, either Josh, Mike or I will contact you. In the meantime, if you have any questions, comments or instructions, please do not hesitate to contact me.

Very truly yours,



Rogge Dunn

RRD/mdh

Enclosure

cc: w/enc. w/o enc. no enc. Joshua J. Iacuone, Esq. (our office)

cc: w/enc. w/o enc. no enc. Connye Cashion, Paralegal (our office)

cc: w/enc. w/o enc. no enc. Billing Clerk

cc: w/enc. w/o enc. no enc. Filing Clerk

cc: w/enc. w/o enc. no enc. RRD Work Files

cc: w/enc. w/o enc. no enc. CDB

Purpose and Scope of Hybrid, Limited Representation Agreement for Individual

Rogge Dunn and Rogge Dunn Group, PC (hereinafter collectively the "Lawyers" or the "Firm") is representing only _____

Scott Crane, individually
(hereinafter "You" or "Your"), not Your directors, shareholders or employees, in a representation limited to: claims against Rave

Restaurant Group (hereinafter "the Assignment"). The Firm and You (hereinafter collectively the "Parties.") The Firm is not representing any trusts, partnerships, joint venturers, corporate entities or Your partners, agents, or affiliated persons or entities. The Firm is not representing You in any other matters. The Firm's representation shall be strictly limited to the Assignment and providing only services of a purely legal nature. The Firm has no duty to represent You in any matters other than the Assignment including, but not limited to, claims that could be brought by or against You regarding any issues or other matter. The Firm is not representing You or advising You in any insurance dispute or regarding any: tax; business; investment; accounting; bankruptcy; debtor's/creditor's rights; financial planning; debt or judgment collection work; a counterclaim arising out of or related to the assignment; or appeals/appellate matters. Should You wish to retain the Firm beyond the Assignment, the Parties must sign a new, written agreement and You will pay an additional, very substantial retainer.

This contract is hereinafter "this Agreement." The Texas Disciplinary Rules of Professional Conduct (hereinafter the "TDR") shall control, to the exclusion of any other "ethics codes," to the extent that any ethical rules govern the Parties' rights and obligations. The Firm's obligations shall be governed by the TDR, even if it works in another state or federal court. The Firm is licensed to practice law only in Texas.

Attorneys' Fees and Litigation Expenses

The billing rates for the attorneys, paralegals and law clerks will be:

\$250/hr for attorneys
\$100/hr for our law clerks;
\$85/hr for paralegals.

These rates will be "frozen" and not be increased during our representation of You regarding Your Claim. In other words, even if Your Claim takes several years to resolve, we will not raise our hourly rates, even though typically, we raise our hourly rates every January.

You promise to pay the Firm's hourly attorneys' fees, plus Litigation Expenses, plus a contingent percentage of the Total Recovery. We bill in tenths of an hour with a .10 minimum rounded to the nearest tenth of an hour. If 1, 2 or 3 minutes are spent on a task, we bill .10. If 10 or 14 minutes are spent on a task, we bill .20. To reduce your attorney's fees, where appropriate, we use attorneys and paralegals with lower billing rates. The Firm may use contract attorneys who are not the Firm employees to work on the Assignment. You will be charged for their work

in an amount greater than what the Firm pays them as we incur the costs of locating, insuring and/or otherwise retaining them. If You want more specific information, You agree to write the Firm.

If this case goes all the way to an arbitration hearing or trial and You lose, the arbitrator or judge will likely award taxable arbitration/court costs (hereinafter "taxable costs") against You. They could also award the Opposing Party's attorneys' fees against You. The taxable costs could be approximately \$ 25,000 or more. If taxable costs or attorneys' fees are awarded against You, You will be solely responsible to pay these.

The claims or causes of action You assert if the Assignment proceeds to a lawsuit/arbitration may involve laws that award attorney's fees to the winner of the litigation. If possible, the Firm will seek recovery of attorneys' fees from Defendant(s) as part of Your claims. However, a jury/judge/arbitrator may not award You any attorney's fees or award a reduced amount. Even if You are not awarded any attorneys' fees, You still promise to pay the Firm for its attorney's fees as set out in this Agreement. Of course, any attorney's fees awarded to You against Defendant(s) belong to You, not the Firm.

Expenses will be incurred to handle the Assignment. It is difficult for the Firm to predict accurately the amount and type of expenses for this case. Some of these are for: court filings; service and subpoenas; court reporters; videographers; investigators; travel and lodging; consultants; experts; focus groups; mock trials; computer research; long distance roaming; SAT phone; postage; photocopying; and exhibits for mediation, focus groups and trial or arbitration (hereinafter collectively the "Litigation Expenses").

The Firm estimates the litigation expenses will probably exceed \$ 50,000 and could be substantially more if this case goes all the way to trial or arbitration. You permit the Firm to incur the litigation expenses it decides are appropriate except Your permission is required for any expense over \$1,000.

We do not charge for the Firm's staff's overtime or faxes, including long distance faxes. We charge \$.13 for copies and what the Firm is billed by FedEx, mock trials, experts, exhibit makers, mediators, court reporters, videographers, private investigators, process servers, couriers and other vendors. We do not charge for long distance or cell calls, except for out-of-country calls and roaming fees. If copy services, hotels or vendors handle faxes/copies, You will be charged only what they bill the Firm and for courier fees. Our flat-rate billing with Westlaw reduces computer research charges. We pass this savings on via pro rata billing for same.

Contingent Attorneys' Fee in Addition to Hourly Rates

In addition to paying hourly rates, You agree to pay the Firm a twenty-five percent (25%) contingency fee taken out of the Total Recovery.

You shall pay the Contingent Fee regardless of any cash, benefits or anything else of value that was or might have been offered to You to settle Your claims before You hired the Firm.

The Total Recovery is everything recovered by settlement, arbitration award, administrative filing, Rule 202, judgment or lawsuit, including without limitation: all amounts recovered including, but not limited to: accelerated vesting; back pay, bonuses, compensation,

the Firm's attorneys' fees to represent You; club memberships; court/arbitration costs; damages; deferred compensation; equity interests; expert fees; equity; forum fees; fringe benefits; health, life, medical, dental, disability or other insurance benefits; increased, extended or bridging of benefits; interest; liquidated or punitive damages; loss of earning capacity, reputation or consortium; options; participating units; OREO, past and future medical and therapy expenses; mental anguish; perquisites; real estate; retirement, pension or 401(k) benefits; REUs; RSUs; statutory damages; equity; stock; vacation benefits and units and _____; and the value of any debts guaranties, indemnifications, payments, obligations or monies You owe any entity or person that are forgiven, not pursued, cancelled or written off, including, but not limited to: overpayments of money or compensation, clawback rights, loans, tuition or training repayments, reimbursements, pledges, promissory notes, personal expenses and credit card charges (previously and hereinafter the "Total Recovery"). The Firm's Contingent Fee is not reduced by any Litigation Expenses or other expenses You pay or the recovery of the Firm's attorneys' fees. There is nothing to be subtracted in determining the Total Recovery.

If You are pursuing claims against an entity to who you provided services/worked for and You are fired before, during or after the Firm's representation begins and You accept any work from RAVE RESTAURANT GROUP or its subsidiaries, parents or related or affiliated entities ("hereinafter "Former Employer") as an employee, consultant, independent contractor, Your annual salary, wages or commissions, compensation will be counted towards the Total Recovery as follows. The value of the annual salary, wages or commissions and compensation to be paid to You will be counted as part of the Total Recovery.

Any year-end discretionary bonuses, stock awards, health, dental, medical, disability or other insurance benefits, retirement or other fringe benefits will not be counted towards the Total Recovery.

Assignment of Your Claims and Causes of Action

You transfer and assign to Dunn, individually, an undivided interest in all of Your Claim that is the subject of the Assignment, plus any claims, rights or causes of action You have against Defendant or Defendant's partners, affiliates or persons acting in concert with Defendant for any wrongs, statutory violations, torts and/or breaches of contract that injured or harmed You, such interest being the percentage You agree to pay as attorneys' fees per this Agreement. If Dunn withdraws from representing You without good cause, Dunn forfeits his rights to the assignment. If Dunn withdraws with good cause, or You fire the Lawyers without good cause, You agree that Dunn is still entitled to receive the Contingent Fee, which You hereby assign to Dunn.

If You fire the Firm without good cause, You agree that Dunn is still entitled to receive the Contingent Fee.

Team Approach

Dunn anticipates providing analysis, advice and, if appropriate, overseeing negotiation and litigation. The Firm will employ a team approach and use other attorneys and paralegals associated with or employed by the Firm now or in the future. The Firm does not promise that Dunn will do most or all of the work. The Firm does not promise and is not required to have any particular the Firm attorney other than Dunn do any work on the Assignment. You agree that

attorneys leaving the Firm, or the reformulation, dissolution, or merger of the Firm with another law firm are not good cause for You to fire Dunn or the Firm.

Deposit/Retainer Required to Begin Representation

To start the Assignment, we require a \$ 2500.00 initial deposit/retainer. We do not promise to handle the Assignment for the amount of the deposit/retainer. Your attorneys' fees and Litigation Expenses could easily far exceed the retainer. Retainers are deposited in our escrow account and neither You nor the Firm will earn interest on same. You authorize the Firm to bill You or make an immediate withdrawal from retainers for attorneys' fees and Litigation Expenses as incurred. We will send You a letter detailing the withdrawal so You can monitor same. If You have questions, or believe attorneys' fees or Litigation Expenses are too high, You promise to notify the Firm in writing within 15 days so together we can evaluate whether they might be reduced in the future. If You don't, we assume You approve of the withdrawal and the Firm's handling of the Assignment. The Firm may require additional retainers of two times the amount: of the initial retainer, any the Firm bill or higher retainer amounts to cover anticipated attorneys' fees and Litigation Expenses, the Firm may hold any existing retainer and instead bill You approximately every 30 days. Ninety days before the date the trial or arbitration hearing is scheduled, You agree to pay an additional very large retainer to cover expected attorneys' fees and Litigation Expenses for said trial/hearing. The Firm will also send You vendors' bills for You to pay directly to the vendors. You agree to pay vendors bills and bills from the Firm for attorneys' fees and Litigation Expenses upon receipt, even if You have paid a substantial retainer.

Any Unused Portion of Deposit/Retainer Will be Refunded

Approximately 60 days after written confirmation that the Firm's representation has ended, the Firm will provide You with a final accounting. This gives the Firm time to receive all bills from vendors before preparing Your final bill. **At that time, any unused retainer will be refunded.**

Your Right to Fire the Lawyers

You have the right to fire the Firm at any time, even if You have no reason. However, unless You have good cause for the firing, You still agree to pay Dunn the Contingent Fee and the Litigation Expenses advanced by the Firm.

Termination of Representation

The Parties are free to end their relationship at any time. Our relationship automatically ends upon written notice or the end of the Assignment. The Firm informing You of legal news does not create an attorney-client relationship or require us to send You legal news. If You breach this Agreement, if any requested retainer or bill remains unpaid after 21 days, the additional trial retainer is not paid 90 days before a trial/arbitration hearing, or the TDR permits or requires the Lawyers to withdraw, You agree that the Firm is relieved from doing any further work and has the absolute right to withdraw immediately from representing You and You will not oppose said withdrawal. If the Firm withdraws, it will give written notice and upon reasonable notice will return Your papers and property and You agree to pay the Firm for all

attorneys' fees and Litigation Expenses up to the time of its withdrawal. The Firm has no duty to find You other attorneys if it withdraws.

Estimates Regarding Attorneys' Fees and Litigation Expenses

The Firm may have given or in the future, upon request, may give attorneys' fees or Litigation Expenses estimates. Attorneys' fees and Litigation Expenses are difficult to predict and are a function of many factors over which the Firm has little control, such as the opposition's tactics. All estimates are subject to variation and are not a maximum or fixed amount.

OPINIONS AND OUTCOME NOT GUARANTEED, DISCLAIMER OF WARRANTIES

Any opinions concerning the Assignment or legal issues are expressions of our judgment, not guarantees. How a judge, jury or arbitrator views the law or facts are variables subject to the vagaries of human nature beyond our control. The Firm makes no guarantee as to any outcome or a favorable result. The Firm's past victories or achievements are no guarantee they can be duplicated in the Assignment. Results depend on the facts of each case. A trial/arbitration is an unpredictable event, the outcome of which may be based upon facts we do not know at this time and on law that may be unclear, uncertain or change over time.

The Firm makes no assurances, representations, guarantees or warranties that it can obtain a particular result or outcome for You. **THE LAWYERS DISCLAIM ANY SUCH WARRANTIES.** You agree that the Firm's analysis and opinions are not a guarantee of any kind.

Your Cooperation and Communication is Critical

Unfortunately, the legal process is long and laborious and includes a number of frustrating delays and continuances. The best way to maximize Your situation and protect Your interests is by a team effort, which requires substantial help, effort and cooperation by You. Promptly providing a typed chronology, documents, e-mails, and answers to our questions gives us the best chance to speed up the process and minimize the delays inherent in litigation. You promise to maintain copies of all documents and electronic data You send to the Firm.

If You ever have any questions, comments or instructions or believe the Firm is not meeting Your expectations, in any respect, You promise to send Dunn a letter specifying all of Your complaints, concerns or issues. You shall provide written notice of any change in Your address, phone and fax numbers, and/or e-mail address within 15 days of a change.

No Prior Promises, Except those Specifically Stated in this Agreement

The Parties promise and represent that no representations, promises, statements, review of materials or a website, presentations or agreements not specifically stated in this Agreement have been made that caused them or motivated them to sign this Agreement. You promise and represent that **YOU ARE RELYING ON YOUR OWN JUDGMENT** after an opportunity to seek separate counsel regarding the advisability of signing this Agreement. You promise and represent that You are not relying on any documents, websites or materials You have reviewed or anything that has been said in any discussions between the Parties or any other person or

entity prior to signing this Agreement that is motivating You to sign this Agreement, except what is contained herein. This Agreement states the entire agreement between the Parties and supercedes any prior oral or written agreements. This Agreement can be amended only by a notarized writing, signed by the Parties.

Dispute Resolution Procedures

If any dispute arises among the Parties, the Parties agree that prior to filing a lawsuit the Parties must participate in a full-day mediation in Dallas, Texas with the mediator's fee split 50/50 between You and the Firm. The party asserting a claim or dispute must send the other party(ies) a written demand for mediation (hereinafter the "Demand"). If You make the Demand, You will specify in the Demand one of the following three mediation groups: Burdin Mediations, Dispute Mediation Service or Gilbert Mediation Group (hereinafter collectively the "Mediation Group") that will select a mediator. If the Firm makes the Demand, within seven days of receipt You must designate in writing the Mediation Group to be used to select the mediator.

If the Parties have not set a date certain in writing to attend mediation within 45 days of any party making a Demand or any party is not cooperating to select one of the Mediation Group, schedule mediation, or otherwise not following the dispute resolution procedures herein (hereinafter the "DRP"), the other party(ies) shall have the right to file a lawsuit to compel compliance with same and the judge is granted authority to require specific performance with the DRP. The party(ies) required to file a lawsuit to compel compliance with the DRP, including, but not limited to, a lawsuit to dismiss a lawsuit filed without first participating in a mediation, shall recover all reasonable and necessary attorneys' fees incurred to prosecute said lawsuit.

Sole, Mandatory Jurisdiction, Venue and Law Governing All Disputes

This Agreement shall be governed by, construed, interpreted and enforced in accordance with and subject to the laws of the State of Texas without regard to any conflicts of law rules or principles. In the event of a dispute, the Parties agree to the sole, exclusive and mandatory jurisdiction and venue in the state and federal courts of Dallas County, Texas. The Parties waive and agree not to raise or plead any defense of forum non conveniens or that Dallas County, Texas is an inconvenient, improper or incorrect place for venue or disputes to be heard.

Miscellaneous

If a provision of this Agreement is or may be held invalid, void, or unenforceable, the Parties want a court to use the blue pencil procedure to reform or revise any such provision to, if possible, make it enforceable. Even if one or more provisions are totally struck from this Agreement, the Parties want the remaining provisions to survive and continue in full force and effect without being impaired or invalidated. And, the Parties want the surviving provisions of this Agreement enforced to the fullest extent permitted by law. Sending a demand letter or entering into negotiations may cause withdrawal of previous settlement offers, if any. The Firm cannot advise You regarding pros and cons of entering into this Agreement. Other qualified attorneys could handle the Assignment and would charge You less. This Agreement is effective upon all Parties' signatures and can be executed in identical counterparts and via fax or email.

THE PARTIES WAIVE THEIR RIGHTS TO A JURY TRIAL

THE PARTIES WAIVE THEIR FUNDAMENTAL, CONSTITUTIONAL RIGHTS TO A JURY TRIAL REGARDING ANY DISPUTES AGAINST ONE ANOTHER. ALL DISPUTES SHALL BE DECIDED BEFORE A JUDGE WITHOUT A JURY. THE PARTIES WANT ALL DISPUTES BETWEEN OR AMONG THEM EXCLUSIVELY DECIDED BY A FEDERAL OR STATE COURT JUDGE OF A COURT HAVING JURISDICTION OVER THE PARTIES, SITTING WITHOUT A JURY. THIS INCLUDES, BUT IS NOT LIMITED TO, ANY AND ALL LAWSUITS, CLAIMS, COUNTERCLAIMS, AND DISPUTES ARISING UNDER, OUT OF OR RELATED TO THIS AGREEMENT, NON-PAYMENT OF ATTORNEYS' FEES AND/OR LITIGATION EXPENSES, THE LAWYERS' REPRESENTATION OF YOU AND ANY CLAIMS FOR MALPRACTICE, NEGLIGENCE, BREACH OF: FIDUCIARY DUTY, WARRANTY OR CONTRACT OR ANY OTHER CLAIMS THE PARTIES MIGHT ASSERT AGAINST ONE ANOTHER. THE PARTIES INTEND THIS JURY WAIVER AGREEMENT TO BE AS BROAD AS POSSIBLE.

THE PARTIES IRREVOCABLY WAIVE THEIR RIGHTS TO A JURY TRIAL. NONE OF THE PARTIES HAVE MADE OR RELIED ON ANY ORAL REPRESENTATIONS TO OR BY ANY OTHER PARTY REGARDING THE PROS AND CONS OR ENFORCEABILITY OF THIS PROVISION. EACH PARTY HAS READ AND PROMISES THEY UNDERSTAND THIS JURY WAIVER.

CAUTION: YOU NEED NOT AGREE TO THIS PROVISION. OTHER ATTORNEYS MAY BE WILLING TO REPRESENT YOU WITHOUT THIS PROVISION. THE FIRM WILL NOT ADVISE YOU ON THIS ISSUE. YOU SHOULD OBTAIN THE ADVICE OF A DIFFERENT ATTORNEY BEFORE AGREEING TO THIS PROVISION.

Your Exclusive Option to Cancel this Agreement

Upon the Firm's receipt of a copy of this Agreement signed by You, the Firm will hold it for at least 24 hours. You may cancel/ back out of this Agreement with no obligation whatsoever if, and only if, You notify Dunn via Email – prior to the time Dunn signs this Agreement and transmits it to You.

Take Your Time Before Signing

TAKE YOUR TIME AND READ THIS CONTRACT CAREFULLY. CONSIDER YOUR OPTIONS. THE FIRM CANNOT ADVISE YOU REGARDING WHETHER OR NOT IT IS IN YOUR BEST INTEREST TO HAVE THE FIRM REPRESENT YOU ON

AN HOURLY BASIS, A CONTINGENT BASIS OR A HYBRID BASIS. YOU SHOULD SEEK THE ADVICE OF A DIFFERENT ATTORNEY REGARDING THE ADVISABILITY OF YOU SIGNING THIS AGREEMENT OR ANY ALTERNATIVE AGREEMENT YOU MIGHT BE ABLE TO OBTAIN WITH THE FIRM OR ANOTHER ATTORNEY.

THE FIRM DOES NOT PROMISE OR GUARANTEE IT WILL WIN ANY MONEY FOR YOU, DEFEAT CLAIMS ASSERTED AGAINST YOU OR WIN YOUR CASE.

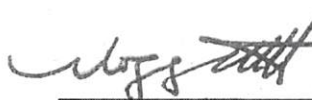
IF YOU DO NOT UNDERSTAND ALL OF THIS AGREEMENT, OR IT DOES NOT CONTAIN ALL AGREEMENTS BETWEEN YOU AND THE FIRM, DO NOT SIGN THIS AGREEMENT.

AGREED:



Rogge Dunn, Individually

ROGGE DUNN GROUP, PC



By: Rogge Dunn
Its: CEO
8/27/19

(Date)

AGREED:



By: Scott Crane

Its: _____

8.26.19

(Date)

By: _____

Its: _____

(Date)

THE “19 COMMANDMENTS”

For The Successful Handling of Your Employment Matter[©]

1. Keep quiet - - “Loose lips sink ships”

- No Facebook postings or Tweets about your dispute
- Revealing any “aces up our sleeve” or strategy destroys our ability to surprise your opponent

2. Make sure your Facebook and social media pages are very professional

- Your Facebook, LinkedIn and social networking postings will be shown to the jury
- Do not discuss your dispute or claim on your Facebook, Twitter or anybody else’s Facebook/Twitter

3. Never use any company computers, PDA’s, cell phones, or iPads to communicate with us

- This waives our attorney/client privilege and enables your opponent to get copies of our communications
- Do not send us text messages from a company cell phone
- Only use your personal e-mail account and a computer/iPad/cell phone that is a personal device you own!!!
- Warning: If you send an e-mail from your personal e-mail account on a company device the Company can obtain that e-mail!!!

4. Don’t do anything regarding your legal matter without talking to us first

- Do not communicate with your opponent or witnesses (or even invite them to lunch)
- Do not communicate with any of our experts or investigators
- Do not take any actions that relate to your legal matter
- Do not settle, offer to settle or enter into negotiations

- Executing a successful game plan requires you consulting with us and considering all strategic options before you take any action

5. If your adversary or a witness calls you

- Listen and take notes, but do not volunteer any information
- Then call us immediately to determine whether you should document the call

6. Do Not Point Out Your Adversaries' Mistakes

- The Company may make mistakes such as not sending you a COBRA notice, not paying you for unused vacation/PTO time or fail to reimburse you for travel and entertainment expenses
- **IMPORTANT:** Do not inform the Company that you have not received a COBRA notice or your insurance/medical expenses have been declined
- **Under** no circumstances should you or anyone else point out their mistakes to them at this time. The Company's failure to make payments due and owing to you may entitle you to recovery of your attorneys' fees and/or other statutory damages
- The Company's mistakes should be revealed only by me at the appropriate time -- which will give you the best negotiating/settlement leverage

7. VOICE MAILS

- Do not leave any voice mails to your opponent other than I am returning your call
- If your opponent leaves you a voice mail, make a recording of it and save it...do not delete any voice mails you received

8. Always keep a copy of anything you send us

- This is more efficient and saves you money
- This ensures you have the copies with you that we may need to discuss

9. Please prepare and update a chronology and timeline of key events

- This ensures precise communication and saves you attorneys' fees
- Tell us everything, together we will decide what is important

10. Communicate promptly if you have any new info, ideas, questions or suggestions

- If we do not promptly respond to you, send Rogge a reminder e-mail and voicemail and contact one of our attorneys or paralegals assigned to your matter.

11. The best way to reach us is by e-mail

- Paralegals watch our e-mails, so e-mails are faster than sending us texts

12. Always refer to your case name in the re: line of all e-mails

- This ensures efficient sorting and filing of all e-mails
- The re: line for your case is Crane / Rave

13. Do NOT take or receive any company property

- Do not take client lists, cost/pricing data
- Do not ask others to send you copies of documents or company property

14. Do NOT download, send or delete anything from the company computer!!!

- We may want you to print out a few key e-mails – ask first
- Do not “clean out” e-mails, texts, files etc. prior to leaving

15. Do NOT throw away or destroy any documents, files or evidence in any way related to your legal matters

- Save all documents and evidence

- Do not delete anything from your phone, PDA, laptop or computer

16. Do NOT tape record anyone!!!

17. Do NOT get witnesses to send letters or write summaries about what happened

18. Always cc Rogge and all Attorneys and the Paralegal assigned to your matter

- This enables anyone on the RDG team to respond promptly by a reply all e-mail
- It speeds up the response time by one of the RDG Team members

19. Electronic Delivery of Documents is Best Practices

- Scan and email us documents, or upload electronic files into a DropBox